

John K. Wood Vice President - Nuclear

419-249-2300 Fax: 419-321-8337

Docket Number 50-346

License Number NPF-3

Serial Number 1-1176

January 29, 1999

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555-0001

Subject: Extension of Response to Inspection Report 50-346/96014

Ladies and Gentlemen:

Toledo Edison (TE) received Inspection Report 50-346/96014 (TE Log Number 1-3793) dated February 25,1997, and the enclosed Notice of Violation. On April 4, 1997, TE responded to the enclosed violation in the letter TE Serial Number 1-1122. Violation 50-346/96014-01c (DRP) identified a condition during the performance of a surveillance test, in which a technician increased the test input pressure to a value greater than specified in the surveillance procedure. The reason for the violation was that no value was provided to limit the test input pressure. As part of the corrective action, TE initiated a review of electrical and control procedures for the use of approximate or unbounded values. Procedure changes were to be initiated for procedures evaluated to need additional guidance. Procedure reviews and change requests were to be completed by July 31, 1998. As an interim measure, training was conducted for Electrical and Controls personnel to sensitize them to the concern over approximate or unbounded limits.

The scope of these reviews encompassed 589 electrical and control procedures. In July, 1998, Electrical and Controls staff personnel identified that the reviews and associated change requests would not be completed by the established TE commitment date. On July 30, 1998, this was communicated to the DBNPS Resident Inspector and a Potential Condition Adverse to Quality Report (98-1483) was initiated. At that time, it was projected that the reviews and change requests would be completed by November 30, 1998. Due to plant events and the unexpected loss of Electrical and Controls staff personnel, procedure reviews and evaluation of procedures for additional guidance are still in progress. Approximately seventy-five percent of the procedure reviews have been completed. Procedure reviews and identification of procedures requiring additional changes will be completed by May 3, 1999. To ensure these reviews are

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completed by May 3, additional Electrical and Controls staff have been assigned to the task and progress is being charted to facilitate additional management oversight of the task.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,

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cc: J. E. Dyer, Regional Administrator, NRC Region III

A. G. Hansen, DB-1 NRC/NRR Project Manager

K. S. Zellers, NRC Region III, DB-1 Acting Senior Resident Inspector

Utility Radiological Safety Board