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Docket No. 50-346

License No. NPF-3

Serial No. 1379

July 6, 1987

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

Subject: Response to Request for Additional Information on Toledo Edison's Response to Generic Letter 83-28 (TAC No. 53665)

Gentlemen:

This is in response to your letters dated March 26, 1987 (Log No. 2260) and June 1, 1987 (Log No. 2316) requesting additional information on Toledo Edison's response to Generic Letter 83-28, Required Actions Based on Generic Implications of SALEM ATWS Events; Item 2.2.

The Toledo Edison letter dated June 10, 1985 (Serial No. 1158), stated that the Vendor Equipment Technical Information Program (VETIP) enhancements would be identified from results of surveys previously conducted at Davis-Besse. The extensive restructuring following the June 9th event caused a reassessment of the implementation plans concerning the VETIP elements and has superceded the need for the evaluation of the surveys. Attachment 1 provides a summary of the vendor interface program at Davis-Besse which implements the requirements of section 2.2.2 of Generic Letter 83-28.

Very truly yours,

SJS:DJS:plf

Attachments

cc: DB-1 NRC Resident Inspector A. B. Davis, Regional Administrator

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DAVIS-BESSE VENDOR INTERFACE PROGRAMS SUMMARY

Vendor Information

A Configuration Management Program has been established. One function of this program is the control of Vendor Technical Manuals (VTMs). Nuclear Group Procedure NG-AV-122, "Vendor Manual Control" documents the process for controlling VTMs and provides for identification of station procedures that may be impacted by vendor manual updates.

Review guidelines and criteria are contained in Engineering Procedure NEP-041, "Vendor Technical Manuals". The procedure currently requires the following:

- 1. Determine VTM applicability to installed plant equipment.
- 2. Verify the VTM is complete (all sections are present).
- 3. Identification of recommended test requirements to the System Engineer.
- 4. Determination of which vendor drawings within the VTM should be part of the Drawing Control System.
- 5. Contacting the vendor to ensure Toledo Edison has the latest applicable information.
- 6. Reviewing the VTM to identify potential problems/discrepancies with the engineering content of the VTM.

A vendor periodic contact program has been initiated and is planned to continue as a permanent activity. The procedure is being revised to incorporate periodic vendor/manufacturer contact.

Since the inception of VETIP, Toledo Edison has created a Systems Engineering organization. Systems Engineers are responsible for developing and maintaining a detailed knowledge of their assigned systems. The interfaces between Performance, System and Design Engineering and Configuration Management together with the controls established by procedures NEP-041 and NG-AV-122 adequately identify, process and update equipment technical information.

Operating Experience Review

The Operating Experience Assessment Program (OEAP) has been enhanced. The Performance Engineering Department reviews reports of operating/ maintenance events within the nuclear industry and determines their applicability to Davis-Besse. With the assistance of personnel from Docket No. 50-346 License No. NPF-3 Serial No. 1379 Attachment 1 Page 2

other departments, the OEAP ensures that lessons learned from operating experience are translated into actions that improve plant safety and reliability at Davis-Besse. The implementation of this program is documented in engineering instruction NEI 322.1. This program utilizes appropriate interfaces between Systems, Performance and Design Engineering on items applicable to Davis-Besse.

Quality Assurance for Service Vendors

Controls on work performance for outside organizations have been established. These work controls for performing safety-related services are implemented in one of two methods:

- Members of outside organizations may be integrated with and become part the Davis-Besse Maintenance work force and work under the Davis-Besse Quality Assurance Program.
- The Quality Assurance program of the outside organization must be approved as it relates to the activity being performed at Davis-Desse. This allows outside organizations to perform work without immediate supervision of Davis-Besse maintenance personnel.

Regardless of which alternative is used to control outside organizations performing maintenance activities, the following requirements are applied:

- Procedures and processes used by outside organizations to perform maintenance activities are approved by Davis-Besse management in accordance with applicable Davis-Besse administrative procedures.
- 2. Surveillance of safety-related maintenance activities is performed under the cognizance of the Davis-Besse Quality Assurance Program.
- 3. Materials, parts, and precision equipment provided by an outside organization are controlled in accordance with Davis-Besse established procedures in that all parts and materials are received through the warehouse and are inspected to the degree necessary to assure that the part or material is acceptable for use in the maintenance activity. Measuring and testing equipment is controlled in accordance with applicable Davis-Besse administrative procedures.