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Docket Number 50-346

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United States Nuclear Regulatory Commission
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Subject: Response to Inspection Report 50-346/98005(DRP)

Ladies and Gentlemen:

Toledo Edison has received Inspection Report (IR) 50-346/98005 (Log Number 1-3969) and an enclosed Notice of Violation; the response to which is provided below. After discussion with the Division of Reactor Projects Branch Chief of the Nuclear Regulatory Commission (NRC) for the Davis-Besse Nuclear Power Station (DBNPS) on July 1, 1998, it was agreed that this response to IR 98005 would be submitted by July 22, 1998.

Reply to a Notice of Violation (50-346/98005-02)

Alleged Violation

During an NRC inspection conducted on April 1 through May 12, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, states, in part, that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Contrary to the above, before April 15, 1998, Procedure DB-OP-06230, "Steam Generator Secondary Side Fill, Drain and Lay up," and Procedure DB-OP-03011, "Radioactive Liquid Batch Release," which were used for steam generator secondary side fill, drain and lay-up and for radiation

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element flushing respectively, were not appropriate to the circumstances in that they did not provide instructions for manipulating the valves on a temporary manifold used during these activities.

This is a Severity Level IV violation (Supplement 1).

Reason for Violation

The reason for this violation is that potential system interactions were not considered in procedures. During the Eleventh Refueling Outage, a temporary demineralized water distribution manifold was installed to service a variety of tasks such as hydrostatic testing, system flushing and filling. The temporary connections and the associated valves were not addressed in procedures that utilize the temporary manifold. When technicians initiated a flush of Radiation Element (RE) 1878 A and B, the hose for filling the Steam Generator was disconnected at its terminal end with its manifold valve open. Opening the manifold isolation valve, which was addressed by the procedure, caused water to flow from the open hose, which was routed to a different room, as well as to the REs being flushed.

The isolation valve for the demineralized water connection for filling the steam generator was installed without consideration of human interface. The operator that secured the Steam Generator filling activity did not see the isolation valve on the temporary manifold for filling the Steam Generator. The valve was installed such that the valve operating handle was behind the pipe and was not readily visible. If the valve had been more visible, it is likely that the valve would have been recognized and closed.

Corrective Steps Taken and Results Achieved

Control of service connections is described in DB-DP-00307, "Station Configuration Control," and allows that Operations Management may reduce the controls over service connections during a plant outage. As a result of this event, action was taken by Plant Operations Section to implement additional requirements for the use of service connections for the remainder of the Eleventh Refueling Outage. Standing Order 98-008, "Control of Demineralized Water Service Connections in the Auxiliary Building," was implemented on April 30, 1998, to provide the following directions in addition to that provided in DB-DP-00307.

- All hoses attached to a supply connection or to a manifold attached to a supply connection will have an isolation valve at the connection or manifold.
- An Information Tag (Maintenance or Operations) will be attached to each isolation valve indicating the test, flush, or other evolution in progress. In addition, a contact name or names for multiple shifts will be provided.
- These isolation valves will be maintained closed unless demineralized water is actually being used for an in-progress test, flush, or other evolution.

- The Primary Zone Operator will monitor the use of these service connections. The contact name for that connection will be contacted to determine the status of the connection for any connections that are open. If the Operator is unable to contact the listed individual(s) or otherwise determine that the test, flush or evolution is still in progress, the service isolation will be closed. Hoses without isolation valves will be removed.

Due to the impact on testing activities which utilize demineralized water in the Auxiliary Building during the remainder of the outage, presentations were made to the Test Group by Performance Engineering regarding Standing Order 98-008. These presentations were made on April 30, 1998.

Corrective Steps Taken to Avoid Further Violations

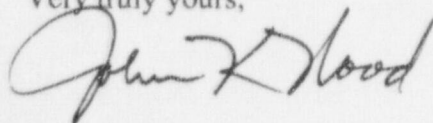
A review of the policies and procedures for the use of demineralized water service connections in the Auxiliary Building during outages will be conducted. This review will be completed and revisions to policies and procedures will be completed prior to the start of the Twelfth Refueling Outage.

Date When Full Compliance Will Be Achieved

Full compliance with the requirement to prescribe instructions appropriate to the circumstance was achieved on April 30, 1998, with the implementation of Standing Order 98-008.

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,



DLM/dlc

cc: A. B. Beach, Regional Administrator, NRC Region III
S. J. Campbell, DB-1 Senior Resident Inspector
A. G. Hansen, NRC/NRR Project Manager
Utility Radiological Safety Board