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Docket Number 50-346

License Number NPF-3

Serial Number 1-880

June 5, 1989

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

Subject: Response to Inspection Report 89-06

Gentlemen:

Toledo Edison has received and reviewed Inspection Report Number 50-346/89-06 (Log Number 1-2085) dated May 3, 1989. The inspection report documented the results of the Emergency Operating Procedures (EOP) inspection led by Mr. P. Kellogg on January 31 - February 9, 1989.

At the time of the Nuclear Regulatory Commission (NRC) inspection, the Davis-Besse Operations Department was involved in a major rewrite of all abnormal procedures. This major rewrite effort is currently still in progress.

Many of the discrepancies NRC identified during the inspection exit were resolved during the procedure rewrite effort. However, the inspection report contains numerous specific discrepancies that will require additional time and effort to resolve. Although discrepancies were identified that need resolution, the inspection report states that the EOPs were found to be adequate for continued operation for the facility. An Emergency Procedure (EP) revision will be required to disposition those discrepancies. In accordance with the EP Procedure Generation Package (PGP) verification and validation program, a technical verification team review will be required. This detailed program requires an extensive commitment of resources and time for implementation of the procedures. Therefore, the resolution of the specific discrepancy items identified in the inspection report will be completed concurrently with the current procedure rewrite effort. The attachment provides Toledo Edison's planned action for resolving each of the Open Items discussed in the inspection report.

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Docket Number 50-346

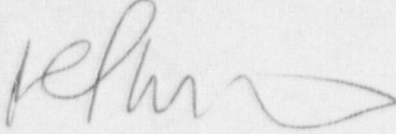
License Number NPF-3

Serial Number 1-880

Page 2

If you have any questions concerning this matter, please contact  
Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'R. W. Schrauder', followed by a horizontal flourish.

BJM/dlm

Attachment

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
T. V. Wambach, DB-1 NRC Senior Project Manager  
G. C. Wright, Chief Operations Branch, NRC Region III

Open Item 50-346/89006-01

Finding:

The inspectors verified that entry conditions into the EOPs were properly and clearly identified and could be easily followed by the operators.

The licensee's treatment of tube failure in once-through steam generators (OTSGs) is organized differently than was specified in the bases material. In pursuing this difference, the inspectors encountered a problem generic to the Davis-Besse EOPs. Only one copy of a historical deviation document exists, and this is not maintained under document control. This is a loose-leaf notebook which contains material generated as early as 1984. The licensee had not dated or specifically identified many of the pages. The licensee has agreed to place this document into the Davis-Besse document control system.

The above document contains the statement (Item 1, Symptoms, page 2): "Tube ruptures are defined in the symptoms as leaks greater than the available make-up capacity. Leaks within the make-up capacity are covered by a separate Abnormal Procedure." This is consistent with the Davis-Besse procedures. However, this approach introduces the problem that symptom oriented guidance may not be provided when operators are not actually in the EP. The inspectors determined that the licensee depends upon operator training, judgment, and understanding to transfer into the EP from other procedures when conditions such as a loss of subcooling occur. This transfer to the EP is key to proper application of the approved generic guidance, and needs to be reinforced. The licensee has agreed to make the following changes:

1. Training will include a specific training subject area that emphasizes loss of subcooling margin, loss of heat transfer, and overcooling conditions, etc. as situations where use of the EP is required if such conditions are encountered while in other procedures.
2. Guidance similar to the information contained in item 1 will be included in the next update of the EP.

The inspectors have concluded that this will meet the intent of the generic guidelines. This item is identified as an Open Item 346/890006-01 pending incorporation of the changes in the training program and EP. With the exception of this item, the inspectors were able to verify that the priority of accident mitigation appeared to be maintained in the EOPs.

Response:

Toledo Edison has evaluated the comments associated with operator training concerning EP entry for OTSG tube failure from other abnormal procedures. The following changes will be made:

1. The training department will provide specific training that emphasizes loss of subcooling margin, loss of heat transfer, and overcooling

conditions, etc. Training on recognition of EP conditions while in other procedures will become a specific training subject area for initial licensing and requalification training. This will be incorporated into the training program by December 1989.

2. Guidance similar to the information in item 1 will be included in the next Revision of EP scheduled for December 1989.

In addition, a copy of a historical deviation document will be placed in the Davis-Besse document control system by September 30, 1989.

Open Item 50-346/89006-02 and 50-346/89006-03

Findings:

The team conducted walk-throughs of the emergency and abnormal procedures (listed in Appendix A) in the control room, in plant, and at the photo mockup of the control room located in the training building.

The EP and the recent vintage Davis-Besse formatted abnormal operating procedures appeared to be generally consistent between the plant labeling and the nomenclature used in the procedures. Those discrepancies noted are enumerated in Appendix C of this report. However, the team determined the older vintage abnormal operating procedures were characterized by numerous discrepancies. In view of the large number of discrepancies and the scheduled August 1989 completion of the conversion process, the team documented technical discrepancy items in the attached Appendix B and only a sample of labeling discrepancies in Appendix C.

While the results of these walk-throughs were generally acceptable, several discrepancies in the areas of technical content, writer's guide adherence, and human factors were noted. Technical and human factors discrepancies are identified in Appendix B while discrepancies between procedure nomenclature and plant labeling are noted in Appendix C. The licensee has committed to evaluate and resolve the discrepancies identified in the aforementioned appendices.

Appendix B discrepancies will be identified as Open Item 50-346/89006-02.

Appendix C discrepancies will be identified as Open Item 50-346/89006-03.

Response 50-346/89006-02:

Toledo Edison is evaluating the comments associated with correction of technical discrepancies contained in the EOPs outlined in Appendix B. The specific comments concerning the EP will be reviewed for incorporation in the next revision by the Technical Verification Team in accordance with the EP PGP. The specific comments concerning the abnormal procedures are reviewed and evaluated by the operations staff. The appropriate comments are proposed for procedure change. For those comments that are deemed not necessary for incorporation, a technical justification will be provided. The comments are

being incorporated into the procedures during the current procedure rewrite effort. Although the procedures are being rewritten and will be issued when approved, the final completion of the procedure rewrite effort is scheduled for December, 1989.

Response 50-346/89006-03:

Toledo Edison is evaluating the comments associated with correction of human factors discrepancies contained in EOPs as outlined in Appendix C.

As discussed in response to Open Item 50-346/89006-02, the specific comments concerning the EP will be reviewed for incorporation in the next revision by the Technical Verification Team in accordance with the EP PGP. The specific comments concerning the abnormal procedures are reviewed and evaluated by the operations staff. Once the comments are dispositioned, the appropriate comments are processed for procedure change. For those comments that are deemed not necessary for incorporation, a technical justification will be provided. The Operations procedure writers guide is used as a controlling document and adherence to the guide will ensure uniformity in the procedures. These change are also scheduled to be completed by December, 1989.

Open Item 50-346/89006-04

Findings:

The team noted, during a walk-through, other areas which require licensee attention. These areas are:

- a. The team observed that some operators were uncertain of the meaning of items explained in the Writer's Guide (e.g., "refer to" vs "go to"; step sequence mandatory or optional; verify/check; etc.). The licensee should provide training in sections of the Writer's Guide to all operators, not just those assigned as procedure writers.
- b. The team observed confusion on the part of some operators when the EOPs were performing leak isolation steps. The confusion existed due to the procedure giving specific instructions for leak isolation, while it remained silent in the restoration of the systems following the determination that it was not the source of the leak. The following steps in the procedures usually assumed that the restoration had taken place (i.e., shutting valves that had been previously shut) but this was not stated.

The team identified these deficient areas to the licensee. Resolution of these issues will be identified as Open Item 50-346/89006-04.

Response:

Toledo Edison has evaluated the comments associated with evaluation of training requirements for identifiable areas of confusion and will complete an operator training session to licensed and non-licensed operators. The

Docket Number 50-346

License Number NPF-3

Serial Number 1-880

Attachment

Page 4

training will address the meaning of the specific items of concern in the Writer's Guide (e.g., "refer to" vs. "go to"; step sequence mandatory or optional; verify/check; etc.) and is scheduled to be completed by December, 1989. In addition, the potential for operator confusion due to the procedures giving specific instruction for leak isolation, will be addressed during the procedure rewrite effort which is currently in progress. This schedule is consistent with the overall procedure rewrite effort as discussed.