

June 12, 1989

Docket No. 50-346

Mr. D. C. Shelton
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Dear Mr. Shelton:

SUBJECT: COMMENTS ON THE TOLEDO EDISON COMPANY RESPONSE TO GENERIC LETTER 88-17 WITH RESPECT TO EXPEDITIOUS ACTIONS FOR LOSS OF DECAY HEAT REMOVAL FOR DAVIS-BESSE NUCLEAR POWER STATION (TAC NO. 69739)

Generic Letter (GL) 88-17 was issued on October 17, 1988 to address the potential loss of decay heat removal (DHR) during nonpower operation. In the GL, we requested (1) a description of your efforts to implement the eight recommended expeditious actions of the GL; and (2) a description of the enhancements, specific plans and a schedule for implementation of the six recommended program enhancements.

The NRC staff has reviewed your response to GL 88-17 on expeditious actions in the letter of January 3, 1989. We find that it appears to meet the intent of the generic letter with respect to expeditious actions. Your response to some items is brief and therefore does not allow us to fully understand your actions taken in response to GL 88-17. You may wish to consider several observations in order to assure yourselves that the actions are adequately addressed:

1. You mention initial training related to loss of DHR with license candidates and continued training for reduced inventory operation, where lowered loop operations are anticipated, with licensed individuals of your staff. It is not specifically stated that maintenance personnel are also included. The item was intended to include all personnel who can affect reduced inventory operation.
2. You indicate that quick closure of the equipment hatch can be made with a minimum of four bolts. You should first verify that you can make a proper seal of the periphery mating surfaces of the equipment hatch to meet the closure criteria when using less than the full compliment of bolts.

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3. For containment closure you have identified flow paths of concern as "flow paths to the atmosphere" However, we are concerned with all containment penetrations that could cause a release (e.g., penetrations from the containment into a fuel handling or auxiliary building).
4. Your addressing of containment closure provided no information regarding how you will keep track of and control the many potential openings which may have to be closed simultaneously. We assume your procedures and administrative controls will address this topic.
5. You mention that a minimum of two incore thermocouples will be monitored in the control room whenever the core is in mid-loop condition and the reactor vessel head is on the reactor vessel. It was not specifically stated whether the temperature indications would be alarmed as recommended in GL 88-17.
6. You indicate that you have plans for a long term modification for two reactor coolant system (RCS) level indications in the control room. However, at present your level measurement is by a tygon tube system in which a local operator records RCS water level every 15 minutes and contacts the control room hourly. You also are considering the use of a closed circuit television in the control room instead of a local operator. You have not described the level instrumentation tap locations or the instrument accuracy. The pressure in the reference leg should approximate the pressure in the void in the hot leg or be compensated to obtain a correct value. A single level indication is acceptable in the short term. Since dependence on one instrument is more susceptible to errors, additional care should be taken to avoid difficulties during midloop operation.
7. Walking the tygon tube following installation to verify lack of kinks or loop seals is necessary. Experience shows that periodic walkdowns are needed after installation. We recommend daily walkdowns when the tygon tube is in use, with an additional walkdown immediately prior to its being placed in use.
8. You have not stated the use of any vent opening on the hot side of the RCS to relieve RCS pressurization. The removal of a pressurizer manway or steam generator manway is a means to provide RCS venting. Calculations need to be performed to verify the effectiveness of RCS openings, however, because even for relatively large hot side openings in the RCS, pressurization to several psi can still result. For example, with removal of a pressurizer manway large steam flows in combination with flow restrictions in the surge line and lower pressurizer hardware may still lead to pressurization.

There is no need to respond to the above observations.

Mr. Donald C. Shelton

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As you are aware, the expeditious actions you have briefly described are an interim measure to achieve an immediate reduction in risk associated with reduced inventory operation, and these will be supplemented and in some cases replaced by programmed enhancements. We intend to audit both your response to the expeditious actions and your programmed enhancement program. The areas where we do not fully understand your responses as indicated above may be covered in the audit of expeditious actions.

This closes out the staff review of your responses to the expeditious actions listed in the GL. The area of programmed enhancements will be addressed in a separate letter.

Sincerely,

/s/

Thomas V. Wambach, Sr. Project Manager
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