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Subject: Voluntary Participation in NRC Regulatory Impact Survey (Generic
Letter Number 90-01)

Gentlemen:

Toledo Edison appreciates the opportunity to participate in the subject
Regulatory Impact Survey. Attached please find the completed Regulatory
Impact Survey Questionnaire sheets which were prepared utilizing the
additional clarifying information to Generic Letter 90-01 provided by NUMARC.

In accordance with the NUMARC guidance, a separate line entry was added to
Item Number 5 of the questionnaire to include involvement by supervisors in
inspection activities. Additionally, the total time data requested in Item
Number 5 is reported in manhours rather than percentage of total time.

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

Very truly yours,

RWG/ssg

Attachment

cc: P. M. Byron, DB-1 NRC Resident Inspector
A. B. Davis, Regional Administrator, NRC Region III
B. Lee Jr. (NUMARC)
T. V. Wambach, DB-1 NRC Senior Project Manager

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC TEAM INSPECTIONS

2. Based on actual experience over the past several years, about how often is this activity conducted? Two NRC Team inspections per year

3. Operations/Construction areas covered: Maintenance, EOP's, Radiation Protection Program

4. Extent of the activity (how many people, for how long) NRC
team inspections generally consist of 4-8 inspectors who are onsite for one to three weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 513 (number involved) 20
 - b. Plant Manager 24
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents 24 (number involved) 1
 - e. Chief Nuclear Officer _____
 - f. Supervisors 413 (number involved) 19

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation: NRC RESIDENT REGION III
AND NRR INSPECTIONS / AUDITS
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 13 Regional Inspections and 8 to 10 Resident Inspections per year
3. Operations/Construction areas covered: Chemistry, Safeguards, Allegations, Radwaste, Fire Protection, Environmental Monitoring and other SALP areas are covered
4. Extent of the activity (how many people, for how long) NRC Resident Inspections consist of 3 inspectors for 4-6 weeks, NRC regional typically inspections consist of 2 inspectors for 1 week.
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in item #1.
 - a. Plant Department Heads 567 (number involved) 18
 - b. Plant Manager 56
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents 12.5 (number involved) 1
 - e. Chief Nuclear Officer _____
 - f. Supervisors 593 (number involved) 25

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO EVALUATIONS/VISITS

2. Based on actual experience over the past several years, about how often is this activity conducted? INPO performs a plant evaluation 12 to 18
months

3. Operations/Construction areas covered: Areas covered in INPO evaluations
include training, maintenance, plant operations, etc.

4. Extent of the activity (how many people, for how long) The plant evaluation
generally include 8-14 individuals on site for approximately 2 weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 331 (number involved) 14
 - b. Plant Manager 60
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents 40 (number involved) 1
 - e. Chief Nuclear Officer _____
 - f. Supervisors 764 (number involved) 52

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INSURERS (ANI)

2. Based on actual experience over the past several years, about how often is this activity conducted? Liability evaluations occur once or twice
a year

3. Operations/Construction areas covered: Liability evaluations generally
cover Fire Protection, general housekeeping, Radiological Monitoring Program
and industry awareness

4. Extent of the activity (how many people, for how long) The evaluation
generally involves 2 individuals for 2-3 days

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 29 (number involved) 6
 - b. Plant Manager 1
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer _____
 - f. Supervisors 50 (number involved) 9

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: US / OHIO EPA

2. Based on actual experience over the past several years, about how often is this activity conducted? Meeting with representatives from the EPA occur approximately 4 times per year

3. Operations/Construction areas covered: The areas covered include the water treatment facility, the NPDES permit program and reportable events

4. Extent of the activity (how many people, for how long) EPA inspections generally involve 1 inspector and last from 1 to 4 hours

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 8 (number involved) 2
 - b. Plant Manager 2
 - c. Corporate Department Heads (number involved)
 - d. Corporate Vice Presidents (number involved)
 - e. Chief Nuclear Officer
 - f. Supervisors 54 (number involved) 8

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: OSHA

2. Based on actual experience over the past several years, about how often is this activity conducted? OSHA inspections typically occur once per year

3. Operations/Construction areas covered: The inspections include investigation of employee complaints, asbestos related activities, and work safety practices

4. Extent of the activity (how many people, for how long) The inspections typically involve 1 inspector for 1½ days

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 24 (number involved) 8
 - b. Plant Manager 7
 - c. Corporate Department Heads (number involved)
 - d. Corporate Vice Presidents 4 (number involved) 1
 - e. Chief Nuclear Officer
 - f. Supervisors 36 (number involved) 8

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: DEPARTMENT OF TRANSPORTATION
(DOT)

2. Based on actual experience over the past several years, about how often is this activity conducted? DOT inspections occur on an annual basis

3. Operations/Construction areas covered: The inspection verifies compliance
with DOT codes and requirements

4. Extent of the activity (how many people, for how long) The DOT
inspections typically involve 2 to 3 personnel for 1 day

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 2 (number involved) 1
 - b. Plant Manager _____
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer _____
 - f. Supervisors 16 (number involved) 2

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: QA AUDITS

2. Based on actual experience over the past several years, about how often is this activity conducted? QA audits are conducted on a quarterly or annual basis depending on the area covered

3. Operations/Construction areas covered: Areas covered during QA audits include training, maintenance, plant operations and other quality related activities

4. Extent of the activity (how many people, for how long) The QA audits typically involve 3 to 6 inspectors for one to two man weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 446 (number involved) 14
 - b. Plant Manager 32
 - c. Corporate Department Heads (number involved)
 - d. Corporate Vice Presidents 8.5 (number involved) 1
 - e. Chief Nuclear Officer
 - f. Supervisors 1000 (number involved) 40

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire sheet

1. Type of inspection, audit or evaluation: NON-OA SELF ASSESSMENTS

2. Based on actual experience over the past several years, about how often is this activity conducted? Several management audits and Quality Assurance Program audits have occurred over the past 2 years

3. Operations/Construction areas covered: All quality related areas

4. Extent of the activity (how many people, for how long) Various

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 294 (number involved) 6
 - b. Plant Manager _____
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents _____ (number involved) _____
 - e. Chief Nuclear Officer _____
 - f. Supervisors 430 (number involved) 14

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation: STATE / LOCAL AUTHORITIES

2. Based on actual experience over the past several years, about how often is this activity conducted? Inspection/visits from state and local officials occur on a non-periodic basis.

3. Operations/Construction areas covered: Plant tours by local officials, state involvement in ASME code related activities, Fire Protection and Emergency Preparedness activities are covered during visits

4. Extent of the activity (how many people, for how long) The number of people involved varies according to the nature of the inspection/visit

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in item #1.
 - a. Plant Department Heads 137 (number involved) 15
 - b. Plant Manager 8
 - c. Corporate Department Heads _____ (number involved) _____
 - d. Corporate Vice Presidents 5 (number involved) 1
 - e. Chief Nuclear Officer _____
 - f. Supervisors 94 (number involved) 16

Note: Numbers given are in manhours per year rather than total time

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: OTHER (SPECIFY)
Joint Utility Management Assessments, Federal Wildlife Service, Ohio
Department of Natural Resources, Army Corps of Engineers
2. Based on actual experience over the past several years, about how often is this activity conducted? These activities occur at varying frequencies
3. Operations/Construction areas covered: Various
4. Extent of the activity (how many people, for how long) Various
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- a. Plant Department Heads 218 (number involved) 13
 - b. Plant Manager
 - c. Corporate Department Heads (number involved)
 - d. Corporate Vice Presidents (number involved)
 - e. Chief Nuclear Officer
 - f. Supervisors 190 (number involved) 20

Note: Numbers given are in manhours per year rather than total time