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

Subject: Toledo Edison Comments on NRC Inspection Report Number 50-346/90012

Gentlemen:

During the June 1, 1990 Enforcement Conference regarding the Core Support Assembly (CSA) movement and the Refueling Canal draindown, Toledo Edison provided clarifications and comments to NRC conclusions made in NRC Inspection Report Number 50-346/90012 dated May 25, 1990. At the conclusion of the meeting, Toledo Edison agreed to submit a letter documenting the issues discussed. Attached are TE comments on the inspection report.

Should there by any questions concerning this matter, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

EBS/ssg

Attachment

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

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Comments on IR 50-346/90012

Toledo Edison provides the following comments to NRC Inspection Report Number 50-346/90012:

1. NRC Statement: (From page 8, 3rd paragraph)

   "The normal method [for draindown] was not utilized as the BWST recirculation pump was out of service."

   TE Response:

   This statement is incorrect. The BWST recirculation pump was out of service, however, this had no impact on the decision to use the Decay Heat (DH) pump for draining the refueling canal. The DH pump was used because it is capable of draining the canal in a more timely manner. This method of draining was also used during the preivous refueling outage. The Refueling Canal draindown procedure (DP-OP-06023) provides specific instructions for draining the refueling canal using the DH pump.

2. NRC Statement: (From page 8, 4th paragraph)

   "The operators were not aware of plant conditions."

   TE Response:

   This statement is misleading. As evidenced by the prompt action taken, the operators were aware of general plant conditions but were specifically not aware that the indexing fixture remained on the Reactor Vessel.

3. NRC Statement: (From page 8, 4th paragraph)

   "Operational decisions were made by outage management."

   TE Response:

   This statement is incorrect. The detailed 6RFO outage schedule consistently depicted the indexing fixture in place during the refueling canal draindown. Misleading information on the outage short interval overview schedule, provided at the Plan of the Day meeting for the time period of the draindown, made it appear like the sequence had been changed. The schedule stated "install stairway/indexing fixture for shielding" after draining the refueling canal. This led operations personnel to believe that the indexing fixture had been removed but was intended to mean that the indexing fixture was already installed for shielding.

4. NRC Statement: (From page 8, 4th paragraph)

"Operators did not stop evolution to determine actual conditions, and did not assume responsibility."

TE Response:

This statement is misleading. When it was recognized that the reactor vessel was draining more quickly than the refueling canal the evolution was promptly stopped. Based on discussions with the Davis-Besse Senior Resident Inspector, both parts of this statement refer to operators not taking responsibility to stop the evolution once it was realized that level indicator LI-214 was not reading accurately. Operators were aware of the disparity between LI-214 and LI-1627 prior to the start of the draindown. They assessed the level indicators available (LI-214, Refueling Canal Level Indicator LI-1627, and BWST Level Indicator) and determined that the draindown could be accomplished safely. Additionally, personnel were assigned to visually monitor the progress of the draindown. The accuracy of LI-214 had no bearing on this event.

5. NRC Statement: (From page 8, 4th paragraph)

"Operators appeared to relegate their responsibilities."

TE Response:

Based on discussions at the Enforcement Conference, this statement refers to the Containment Coordinator visually observing the early stages of the draindown. Toledo Edison reiterates that the operators did not relegate their responsibility. The Shift Supervisor and Reactor Operator were fully aware that the draindown was their responsibility. They simply used competent resources available on the shift to assist them in their duties. This practice is also routinely employed using systems engineers, chemistry and radiological controls personnel, and maintenance personnel, as appropriate to the evolution.