Mr. John K. Wood Vice President - Nuclear, Davis-Besse Centerior Service Company c/o Toledo Edison Company Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, OH 43449-9760

SUBJECT:

DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - REQUEST FOR

ADDITIONAL INFORMATION, PROPOSED CHANGE TO QUALITY ASSURANCE

PROGRAM (TAC NO. M98623)

Dear Mr. Wood:

The NRC staff has completed its initial review of your 10 CFR 50.54(a)(3) request for changes to the Davis-Besse Nuclear Power Station, Unit 1, Updated Safety Analysis Report, Section 17.2, "Quality Assurance During the Operating Phase," contained in your letter dated April 25, 1997. Based on the staff's preliminary review of this submittal, several issues have been identified which require clarification in order for the staff to complete its evaluation. Details are provided in the enclosure.

Please contact me at 301-415-1390 if you have any questions related to this request.

Sincerely,

Original signed by:

Allen G. Hansen, Project Manager Project Directorate III-3 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request for Additional

Information

cc w/encl: See next page

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John K. Wood Toledo Edison Company

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Davis-Besse Nuclear Power Station Unit 1

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State of Ohio Public Utilities Commission 180 East Broad Street Columbus, Ohio 43266-0573

Attorney General Department of Attorney 30 East Broad Street Columbus, Ohio 43216

President, Board of County Commissioner of Ottawa County Port Clinton, Ohio 43252

PROPOSED CHANGE TO QUALITY ASSURANCE PROGRAM DESCRIPTION DAVIS-BESSE NUCLEAR POWER STATION. UNIT 1

- Please provide a list of audit findings documented during the last 2 years and identify from this list each finding that would continue to be treated as an "audit finding" (that is, a Category 1 or 2 Potential Condition Adverse to Quality [PCAQR]) and each that would be treated as a Category 3 or 4 PCAQR under the proposed process.
- Please explain how audit findings that are not classified as "significant conditions adverse to quality" would be uniquely identified, tracked, and trended under the proposed process.
- 3. Would audit findings that are identified as "significant conditions adverse to quality" be tracked or trended differently than other PCAQRs classified as Category 1 or 2?
- 4. Under the provisions of the proposed audit finding system, please describe how you would determine the need for a follow-up audit of deficient findings as required by Criteria XVI and XVIII of Appendix B to 10 CFR Part 50.
- 5. The proposed approach would establish a new threshold for the identification and reporting of audit findings (that is, significant conditions adverse to quality), and audit issues that did not satisfy this new threshold would be processed separately in accordance with your PCAQR program. Given that one of the primary objectives of the QA audit process is to independently identify programmatic weaknesses and deficiencies for management attention, please describe how the proposed process would evaluate audit issues which are no longer identified as "audit findings."