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Docket Number 50-346

License Number NPF-3

Serial Number 2678

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Subject: Commitment Change Summary Report

Ladies and Gentlemen:

The FirstEnergy Nuclear Operating Company (FENOC) hereby submits the attached Commitment Change Summary Report for the Davis-Besse Nuclear Power Station, Unit Number 1 (DBNPS), pursuant to the Nuclear Energy Institute (NEI) document, "Guideline for Managing NRC Commitments," Revision 2, dated December 19, 1995. DBNPS adopted the above guideline with a revision to the Commitment Management procedure effective August 1, 1996.

The DBNPS commitment changes identified between the dates of May 24, 1998 and May 18, 2000 (end of Twelfth Refueling Outage) are included in this report. This report includes a description of the identified commitments, a summary of the changes made to the commitments, and a brief statement describing the basis for the change. The DBNPS has reviewed and implemented the commitment changes in accordance with the NEI document, "Guideline for Managing NRC Commitments." Per this guideline, DBNPS has determined that the submittal of this report is the only required notification regarding changes to commitments listed in the attached summary.

If you have any further questions concerning this matter, please contact Mr. David H. Lockwood, Manager – Regulatory Affairs at (419) 321-8450.

Sincerely yours,



RJS/san

Attachments

cc: J. E. Dyer, Regional Administrator, NRC Region III
S. P. Sands, DB-1 NRC/NRR Project Manager
K. S. Zellers, DB-1 Senior Resident Inspector
Utility Radiological Safety Board, State of Ohio

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Manager – Regulatory Affairs (419) 321-8450 at Davis-Besse of any questions regarding this document or associated regulatory commitments.

<u>COMMITMENTS</u>	<u>DUE DATE</u>
None	N/A

DAVIS-BESSE NUCLEAR POWER STATION
 COMMITMENT CHANGE SUMMARY REPORT
 MAY, 1998 - MAY, 2000

Commitment Number / Source / Date	Commitment Description	Change	Reason for Change
O16682 LER 91-008 (04/28/92)	Revise procedures to enhance requirements for pre-evolution briefing content.	Modify procedure to include the Work Control Center as an option for pre-job briefings as well as the Control Room.	Reduces burden on control room personnel while still providing adequate pre-job briefings.
O15555 SERIAL 1-0904 (01/30/90)	Review and perform test procedures for component cooling water heat exchangers per Generic Letter 89-13	Heat exchanger performance no longer determined through service water flow rate data trending. Trending is now based on component cooling water temperature data through the heat exchangers.	High uncertainty rates in cooling water flow have led to erroneous results.
O01235 SRTP HVAC-RR-4 (09/30/86)	Upgrade Preventive Maintenance program to inspect seals on doors 501, 509, and 512 for degradation.	Monthly Preventive Maintenance program replaced with monthly or quarterly door checks, depending on past performance, and 18-month checks of door closure mechanisms.	Revised Preventive Maintenance frequency is adequate based on the maintenance history of the doors.
O04855 GL 85-002 (04/17/85)	Condenser tubes are cleaned each refueling outage using shot plugs.	Remove reference to specific tube cleaning method; specify that tube cleaning must be performed before eddy current testing.	New cleaning methods have been identified; eddy current testing is not acceptable in dirty condenser tubes.

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O13824 GL 81-021 (05/05/81)	Emergency procedures allowed a 10-degree per hour cooldown rate for natural circulation cooldown.	Allow 50 degree per hour cooldown rate.	A 50-degree per hour cooldown rate has been determined to be safe and justified based on the results of GPU Nuclear TMI-1 Topical Report 017, Revision 1.
O05558 SERIAL 1423 (09/23/87)	Primary Water Storage Tank Transfer Pumps identified in procedure are used to control Reactor Coolant System inventory, as described in procedure "Loss of Decay Heat Removal".	The Primary Water Storage Tank and associated components are abandoned in place, rendering Primary Water Storage Tank transfer pumps unavailable to control Reactor Coolant System inventory.	Several systems provide a source of water that meets or exceeds the requirements for control of Reactor Coolant System inventory.
O09699 LER 86-003 (01/16/86)	Procedures will include time frame for transformer tap changes.	Remove reference to shutdown and specify that the RCP motors and circulating water pump motors are off, which indicates shutdown.	This change provides more specific details of the minimal 4160-volt bus loading to aid in the implementation of tap changes.
O14019 IR 88-008-02 (04/07/88)	Control limits for chemistry quality charts should be adjusted on a monthly or quarterly basis.	Limits will be adjusted based on the number of samples obtained.	This change provides a more appropriate method based on sample frequency, and O14019 is still implemented for Analytical Acceptance Criteria.

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O00414 SERIAL 874 (12/22/82)	Procedures for abnormal secondary water chemistry must be maintained.	Alarm panels removed for several feedwater/condensate system parameters, alarm and associated procedures are deleted.	Corrective action guidelines and action levels are now contained in Operational Chemical Control Limits procedure for parameters deemed important by NEI 97-06.
O00409 SERIAL 874 (12/22/82)	Monitor certain points to maintain strict feedwater chemistry, which included pH monitoring of Steam Generator steam and Deaerator Storage Tank outlet.	Eliminate requirement to continuously monitor Steam Generator steam and Deaerator Storage Tank Outlet for pH.	DBNPS still has the ability to perform grab samples if necessary; also influents and effluents are monitored so program effectiveness is not reduced.
O00423 SERIAL 874 (12/22/82)	Administrative procedures for abnormal secondary water chemistry must be maintained.	Alarm panels removed for several feedwater/condensate system parameters, alarm and associated procedures are deleted.	Corrective action guidelines and action levels are now contained in Operational Chemical Control Limits procedure for parameters deemed important by NEI 97-06.
O01417 LER 86-019 (12/18/86)	Procedure for the calibration of a Foxboro temperature controller includes check for correct position of the Normal/Reverse switch.	The procedural requirement was eliminated.	A plant modification installed a new type of controller that does not contain a Normal/Reverse switch; therefore the procedure is not needed.

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O07305 LER 85-001 (02/28/85)	Surveillance test procedure for Atmospheric Vent Valve testing pertinent to technical specification 4.6.3.1.2.a	Remove reference to technical specification 4.6.3.1.2.a	Updated Safety Analysis Report identifies Atmospheric Vent Valves as manual valves, and tech specification 4.6.3.1.2.a does not apply to manual valves.
O17534 SERIAL 1-1036 (03/14/94)	Revise procedure to eliminate requirement to close audit findings within 2 weeks.	Close findings based upon assessment that stated corrective actions are satisfactorily completed, with assessment coming within 30 days of corrective action completion.	No ANSI requirements pertain to initial assessment of corrective actions for audit findings, implementation of commitment is not adversely impacted since an assessment is still performed.
O14438 SERIAL 1182 (08/14/86)	Perform monthly surveillance tests of plenum pressure to verify that Containment Air Cooler fans are discharging air in slow and fast speed.	Allow additional methods of flow verification, which may include plenum pressure, motor current, differential temperatures, or measuring and test equipment.	The plenum pressure transmitter can fail during power operations, and requires passing through a high radiation area to gain access for maintenance.
O15555 SERIAL 1-0904 (01/30/90)	Perform flow test procedures for Emergency Core Cooling System Room Coolers per Generic Letter 89-013, "Service Water Systems Problems Affecting Safety-Related Equipment".	Preventive maintenance inspection procedures replace flow test procedures as implementing documents for the Emergency Core Cooling System room coolers.	Current methods, including the use of PROTO-HX software, produce unusable fouling factors when normal instrument errors are input.

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O18733 LER 97-008 (04/17/97)	Perform Safety Features Actuation System 18-month surveillance requirement on a monthly basis to ensure a complete check of 2-out-of-4 Safety Features Actuation System logic gates is performed for each output module.	Change procedure test frequency from monthly to quarterly in accordance with License Amendment 230.	Combination of Interchannel Logic Test and quarterly Automatic Reactor Trip System test provide overlapping checks of 2-out-of-4 logic as currently required by the Technical Specifications.
O13542 IR 83-016-22F (08/30/84)	Physical requirements specified for fire brigade members included an annual respiratory physical.	Change required interval for respiratory physicals from annual to biannual.	This reflects changes allowed by Regulatory Guideline 8.15 and 10CFR20 subpart h.
O18385 LER 96-004 (05/17/96)	Incorporate review of NRC Information Notices into Corrective Action Program.	Include review of NRC Information Notices in the revised Operating Experience review program.	The Operating Experience program was changed to include reviews by an Operating Experience Review Committee, which provides adequate review.
O15950 SERIAL 1-0934 (10/29/90)	Direct communication between the Control Room and personnel in Containment during core alteration load handling operations.	Direct communications between the Control Room and Containment for the Core Support Assembly lift was deleted.	License Amendment 224 revised the definition of a Core Alteration, which now excludes the Core Support Assembly lift.

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O15196 IR 81-010-04 (06/19/81)	Perform as found Local Leak Rate Test prior to repairs or adjustments.	Close commitment.	New Appendix J Option B test requirements have been adopted per License Amendment 96-0012 (requires as found testing but not Local Leak Rate Test).
O07319 LER 86-007 (02/01/86)	Perform surveillance of plenum pressure to verify Containment Air Cooler design flow requirements are met.	Allow additional methods of flow verification, which may include plenum pressure, motor current, differential temperatures, or measuring and test equipment.	The plenum pressure transmitter can fail during power operations, and requires passing through a high radiation area to gain access for maintenance.

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List of Abbreviations Used

GL	Nuclear Regulatory Commission Generic Letter
IN	Nuclear Regulatory Commission Information Notice
IR	Nuclear Regulatory Commission Inspection Report
LER	Licensee Event Report
SERIAL	Letter from Davis-Besse Nuclear Power Station to Nuclear Regulatory Commission
S RTP	System Review and Test Program Report