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Docket Number 50-346

License Number NPF-3

Serial Number 2687

April 4, 2001

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

Subject: License Amendment Application to: Delete Technical Specifications (TS) 1.7, Definitions - Reportable Event, and TS 6.6, Reportable Event Action; Revise TS 6.5.3, Technical Review and Control – Activities, and TS Bases 4.0.3, Applicability (LAR Number 00-0007)

Ladies and Gentlemen:

Enclosed is an application to amend the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License Number NPF-3, Appendix A, Technical Specifications (TS). The proposed changes involve Technical Specification (TS) 1.7, Definitions - Reportable Event; TS 6.5.3, Technical Review and Control – Activities; TS 6.6, Reportable Event Action; and TS Bases 4.0.3, Applicability.

This License Amendment Request (LAR) proposes deleting TS 1.7, Definitions - Reportable Events, and TS 6.6, Reportable Event Action, from the DBNPS Operating License and revising TS 6.5.3, Technical Review and Control - Activities, and TS Bases 4.0.3, Applicability. These changes are being proposed to delete TS requirements already required by Title 10 of the Code of Federal Regulations Part 50 (10CFR50), update the TS Bases to reflect recent changes made to 10 CFR50.73, revise the approval authorizations for procedures, plant modifications, tests and experiments, and reflect recent changes made to 10CFR50.59.

The FirstEnergy Nuclear Operating Company (FENOC) requests that this License Amendment Request be approved by the NRC by October 15, 2001.

A001

Should you have any questions or require additional information, please contact Mr. David H. Lockwood, Manager - Regulatory Affairs, at (419) 321-8450.

Very truly yours,

KAS/laj

Enclosures

cc: S. P Sands, DB-1 NRC/NRR Project Manager
J. E. Dyer, Regional Administrator, NRC Region III
K. S. Zellers, NRC Region III, DB-1 Senior Resident Inspector
D. J. Shipley, Executive Director, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)
Utility Radiological Safety Board

APPLICATION FOR AMENDMENT

TO

FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION

UNIT NUMBER 1

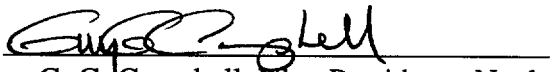
Attached are the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 2687) concern:

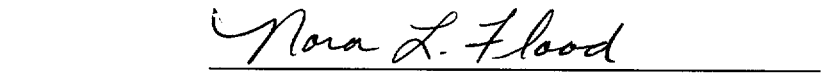
Appendix A, Technical Specifications (TS):

TS Index	Pages I, XV
Definition 1.7	Reportable Event
TS 6.5.3	Technical Review and Control - Activities
TS 6.6	Reportable Event Action
Bases 4.0.3	Applicability

I, Guy G. Campbell, state that (1) I am Vice President - Nuclear of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification on behalf of the Toledo Edison Company and The Cleveland Electric Illuminating Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.

By: 
G. G. Campbell, Vice-President - Nuclear

Affirmed and subscribed before me this 4th day of April, 2001.



Notary Public, State of Ohio
Nora L. Flood
My Commission expires September 4, 2002.

The following information is provided to support issuance of the requested amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License NPF-3, Appendix A, Technical Specifications (TS). The amendment request involves changes to (TS) TS 1.7, Definitions - Reportable Event; TS 6.5.3, Technical Review and Control - Activities; TS 6.6, Reportable Event Action; and TS Bases 4.0.3, Applicability.

A. Time Required to Implement: These changes are to be implemented within 120 days after NRC issuance of the License Amendment.

B. Reason for Change (License Amendment Request 00-0007): This License Amendment Request (LAR) proposes deleting TS 1.7, Definitions - Reportable Events, and TS 6.6, Reportable Event Action, and revising TS 6.5.3, Technical Review and Control - Activities, and TS Bases 4.0.3, Applicability.

These changes are being proposed to delete TS requirements already required by Title 10 of the Code of Federal Regulations Part 50 (10 CFR50), update the TS Bases to reflect recent changes made to 10 CFR50.73, revise the approval authorizations for procedures, plant modifications, tests and experiments, and reflect recent changes made to 10 CFR50.59.

C. Safety Assessment and Significant Hazards Consideration: (See Attachment 1).

D. Environmental Consideration: (See Attachment 2).

Docket Number 50-346
License Number NPF-3
Serial Number 2687
Attachment 1

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION FOR LICENSE AMENDMENT REQUEST 00-0007

(15 pages follow)

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION FOR LICENSE AMENDMENT REQUEST NUMBER 00-0007

TITLE:

Delete Technical Specification (TS) 1.7, Definitions - Reportable Event, and TS 6.6, Reportable Event Action; Revise TS 6.5.3, Technical Review and Control - Activities, and TS Bases 4.0.3, Applicability

DESCRIPTION:

This License Amendment Request proposes deleting Technical Specification (TS) 1.7, Definitions - Reportable Event, and TS 6.6, Reportable Event Action, from the Davis-Besse Nuclear Power Station (DBNPS) Operating License; and revising TS 6.5.3, Technical Review and Control – Activities, and TS Bases 4.0.3, Applicability.

As described below, these changes are being proposed to delete TS requirements already required by Title 10 of the Code of Federal Regulations Part 50 (10 CFR50), update the TS Bases to reflect recent changes made to 10 CFR50.73, revise the specified approval authority for procedures, plant modifications, tests and experiments while continuing to meet ANSI/ANS-3.2 - 1982, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and reflect recent changes made to 10 CFR50.59. Specifically, these proposed changes would:

- Delete the definition in TS 1.7 for a Reportable Event, that references 10 CFR50.73.

- Delete TS 6.6, Reportable Event Action, which requires Reportable Events be reported to the NRC and/or a report submitted in accordance with 10 CFR50.73, and requires that each Reportable Event be reviewed by the Station Review Board, and the results of the review submitted to the Company Nuclear Review Board and the Vice President, Nuclear.

- Revise the requirements of TS Bases 4.0.3, Applicability, which states, in part:

  "However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73 (a) (2) (i) (B) because it is a condition prohibited by the plant's Technical Specifications."

to read (changes in *italics*):

"However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that *may be* subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and therefore, *the* reportable event requirements of 10 CFR 50.73 (a) (2) (i) (B) *should be reviewed for applicability.*"

This revises the text to be consistent with the recent revision to 10 CFR50.73.

- Replace TS 6.5.3.1 requirements that specify the Plant Manager approve various procedures, plant modifications, and tests and experiments, with requirements that the approval authority be "procedurally authorized individuals." NRC approval of this change will allow for designation in procedures of the most appropriate authority for activities affecting nuclear safety, and will allow increased organization flexibility and responsiveness, while continuing to meet ANSI/ANS-3.2-1982.

- Replace the term, "unreviewed safety question" in TS 6.5.3.1.f with reference to "prior NRC approval is required pursuant to 10 CFR50.59" since the term "unreviewed safety question" has been removed from 10 CFR50.59.

The marked up TS 1.7, Definitions - Reportable Event; TS 6.5.3, Technical Review and Control – Activities; TS 6.6, Reportable Event Action; and TS Bases 4.0.3, Applicability, are attached. Pages I and XV of the TS Index would be revised to reflect these changes.

SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED:

The activities affected by these changes, if approved by the NRC, are the administrative location of TS 1.7 and TS 6.6 reportability requirements; the designated approval authority for procedures, plant modifications, and tests and experiments affecting nuclear safety; the authority for designating reviewers for the aforementioned activities affecting nuclear safety; and the use of the term "unreviewed safety question" that is no longer used in 10 CFR50.59.

FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The overall function of the Operating License, Appendix A, Technical Specifications is to impose those conditions or limitations upon reactor operation necessary to preserve the validity of the results of the USAR design bases accidents. The function of the TS Section 6.0, "Administrative Controls," as stated in 10 CFR 50.36(c)(5), is to provide provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure plant operation in a safe manner.

The function of TS 1.7, Definitions - Reportable Event; TS 6.6, Reportable Event Action; and the portion of TS Bases 4.0.3 being revised is to provide for review and NRC notification of events pursuant to the regulatory requirements of 10 CFR 50.73.

The function of TS 6.5.3, Technical Review and Control – Activities, is to provide requirements for the following activities affecting nuclear safety: preparation, review, and approval of procedures; review and approval of changes or modifications to plant structures, systems, and components; and review and approval of proposed tests and experiments. Technical Specification 6.5.3 also provides requirements for the designation and qualifications of the staff performing these reviews.

The function of the portion of TS Bases 4.0.3, Applicability, being revised is to describe the reportability requirements for a missed Surveillance Requirement.

EFFECTS ON SAFETY:

Specific discussion on the proposed changes and their effect on nuclear safety follows:

TS 1.7, Definitions - Reportable Event; TS 6.6, Reportable Event Action; and TS Bases 4.0.3, Applicability:

The proposed changes to delete TS 1.7, Definitions - Reportable Event, and TS 6.6, Reportable Event Action, are consistent with their absence from the improved "Standard Technical Specifications - Babcock and Wilcox Plants," NUREG-1430, Revision 1, dated April, 1995. Reportable Events are addressed by 10 CFR50.73. There is no need to duplicate requirements in the TS that are already required and controlled by NRC regulation in 10 CFR50. The plant's FirstEnergy Nuclear Operating Company Quality Assurance Program requirements are comparable to Technical Specification 6.6.1.b requirements. Specifically, the DBNPS is committed to ANSI/ANS-3.2-1982, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," through its Quality Assurance Program. ANSI/ANS-3.2-1982 requires in Sections 4.3, "Independent Review Program," and 4.4, "Review Activities of the Onsite Operating Organization," that the onsite operating organization (SRB) and independent review body (CNRB), review Reportable Events. ANSI/ANS-3.2-1982, Section 4.2, "Independent Review and Audit Program Description," requires a written program for the distribution of independent review and audit reports to management. Any future changes to this Quality Assurance Program would be controlled in accordance with 10 CFR50.54(a). Furthermore, DBNPS Updated Safety Analysis Report (USAR) Section 13.4.1, Station Review Board, and Section 13.4.2, Company Nuclear Review Board, require Reportable Events be reviewed and the results provided to the Vice President, Nuclear. Any changes to the USAR would be controlled in accordance with applicable regulations, for example 10 CFR50.59 or 10 CFR50.71(e).

On December 27, 2000, the FirstEnergy Nuclear Operating Company submitted a revision of the current Quality Assurance Program, which is applicable to the DBNPS, to the NRC for approval under DBNPS letter Serial Number 2683. This revision proposes changing the commitment from ANSI/ANS-3.2-1982 to ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality

Assurance for the Operational Phase of Nuclear Power Plants." The content of Sections 4.2, 4.3, and 4.4 is essentially the same and the conclusion of the above discussion is the same regardless of the commitment being to ANSI/ANS-3.2-1982 or ANSI N18.7-1976/ANS-3.2.

Based on the above, it is concluded that deleting these administrative requirements from the TS will have no adverse effect on nuclear safety.

The modification to TS Bases 4.0.3, Applicability, is being changed to reflect the recently revised requirements of 10 CFR50.73 (a)(2)(i)(B) that a missed surveillance test is no longer reportable as long as the equipment passes the test when it is performed. Therefore, this proposed change will have no adverse effect on nuclear safety.

The proposed changes to the TS Index reflect the above proposed deletion of TS 1.7 and TS 6.6 and are, therefore, administrative in-nature. Accordingly, these changes do not adversely affect nuclear safety.

TS 6.5.3, Technical Review and Control - Activities:

Technical Specification 6.5.3.1 identifies the approval authority for plant procedures, (including plant administrative procedures), Industrial Security Plan Implementing Procedures, Emergency Plan Implementing Procedures, plant modifications, proposed tests and experiments, and the designation of individuals for performing reviews of the above items. The proposed change to replace the Plant Manager with the "procedurally authorized individuals" as the approval authority continues to meet the ANSI/ANI-3.2-1982, requirements to provide approval authority. The DBNPS is committed to ANSI/ANS-3.2-1982 through its Quality Assurance Program. ANSI/ANS-3.2-1982, Section 5.2.15, "Review, Approval and Control of Procedures," requires such approvals be provided by "authorized personnel," and does not limit this to a single individual, such as the Plant Manager.

This change will allow for other DBNPS plant management to approve these items when their position is designated the approval authority for the procedure controlling the activity. In addition, because the approval authority will be that established for the procedure, it is no longer necessary for TS 6.5.3.1.a to provide for the delegation of approvals to a lower management level than the Plant Manager. The designation of "procedurally authorized individuals" and the ongoing commitment to ANSI/ANS-3.2-1982 will maintain proper control over the items listed in TS 6.5.3.1. In addition, the TS 6.5.3.1.e requirement for individual reviewers to meet the qualification requirements of ANSI 18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," is not affected by the proposed changes.

As discussed earlier, the Quality Assurance Program commitment to ANSI/ANS-3.2-1982 has been proposed to be revised to ANSI N18.7-1976/ANS 3.2 by letter submitted to the NRC on December 27, 2000. The content of Section 5.2.15 concerning approval authority is essentially the same and the conclusion of the above discussion is the same regardless of the commitment being to ANSI/ANS-3.2-1982 or ANSI N18.7-1976/ANS-3.2.

The proposed change to TS 6.5.3.1.f that replaces the term "unreviewed safety question" is an administrative change consistent with the recent change to 10 CFR50.59.

Based on the above, these proposed changes to TS 6.5.3.1 do not adversely affect nuclear safety.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated: (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. The Davis-Besse Nuclear Power Station has reviewed the proposed changes and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station, Unit Number 1, in accordance with these changes would:

1a. Not involve a significant increase in the probability of an accident previously evaluated because no accident initiators, conditions or assumptions are affected by the proposed changes to delete Technical Specification (TS) 1.7, Definitions - Reportable Event, and TS 6.6, Reportable Event Action, from the Davis-Besse Nuclear Power Station (DBNPS) Operating License; and revise TS Bases 4.0.3, Applicability. Reportable Events are addressed by 10 CFR50.73 and it is not necessary for the TS to include items already required by federal regulation. The proposed changes to TS Bases 4.0.3 would make these Bases consistent with the recent revision to 10 CFR50.73. The proposed changes to the TS Index reflect the deletion of TS 1.7 and TS 6.6, Reportable Event Action, and are administrative changes.

The proposed changes to TS 6.5.3, Technical Review and Control – Activities, provide for the approval of activities affecting nuclear safety by personnel authorized by procedure. These changes continue to implement the DBNPS Quality Assurance Program commitments. Qualification requirements for individuals performing reviews of activities affecting nuclear safety are not affected. Accordingly, there is no increase in the probability of an accident.

1b. Not involve a significant increase in the consequences of an accident previously evaluated because no accident conditions or assumptions are affected by the proposed changes. The proposed changes do not alter the source term, containment isolation, or allowable releases. The proposed changes, therefore, will not increase the radiological consequences of a previously evaluated accident.

2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident initiators or assumptions are introduced by the proposed changes. The proposed changes do not alter any existing accident scenarios,

or involve a modification or change in operation of any plant systems, structures, or components.

3. Not involve a significant reduction in a margin of safety because the proposed changes are administrative in-nature and do not reduce or adversely affect the capabilities of any plant structures, systems or components to perform their nuclear safety functions.

CONCLUSION:

On the basis of the above, the Davis-Besse Nuclear Power Station has determined that this License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed mark-up changes to the Operating License.

REFERENCES:

1. NUREG-1430, Revision 1, "Standard Technical Specifications - Babcock and Wilcox Plants," dated April, 1995.

2. 10 CFR 50.36, "Technical Specifications."

3. 10 CFR 50.54, "Conditions of Licenses."

4. 10 CFR 50.59, "Changes, Tests, and Experiments," (64 FR 53582, dated October 4, 1999, and 65 FR 77773, dated December 13, 2000)

5. 10 CFR 50.71, "Maintenance of Records, Making of Reports."

6. 10 CFR 50.73, "Licensee Event Report System," (65 FR 63769, dated October 25, 2000).

7. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

8. DBNPS Updated Safety Analysis Report (USAR), through Revision 22, November, 2000.

9. DBNPS Operating License, Appendix A, Technical Specifications, through Amendment 244.

10. ANSI/ANS-3.2-1982, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

11. ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

12. FirstEnergy Nuclear Operating Company Quality Assurance Program Manual, Revision 0.

13. FirstEnergy Nuclear Operating Company letter (Serial Number 2683) to NRC, dated December 27, 2000, "Request for Approval of FENOC Quality Assurance Program Manual, Revision 1."

DEFINITIONS

INDEX

ADMINISTRATIVE CONTROLS

~~REPORTABLE EVENT~~

1.7 Deleted ~~A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.~~

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

a. All penetrations required to be closed during accident conditions are either:

   1. Capable of being closed by the Safety Features Actuation System, or

   2. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except those approved to be open under administrative controls,

b. The equipment hatch is closed,

c. Each air lock is in compliance with the requirements of Specification 3.6.1.3,

d. The containment leakage rates are within the limits specified in the Containment Leakage Rate Testing Program, and

e. The sealing mechanism associated with each penetration (e.g., welds, bellows or 0-rings) is OPERABLE.

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Manager - Radiological Control who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the Manager - Plant Operations whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

6.4 Deleted

6.5 REVIEW AND AUDIT

6.5.1 Deleted

6.5.2 Deleted

Pages 6-6 through 6-11 have been deleted. The next page is 6-12.

FOR INFORMATION ONLY

ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

a. Plant procedures required by Section 6.8.1 and changes thereto shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Plant procedures, (including plant administrative procedures), Industrial Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures ~~other than plant administrative procedures~~ will be approved ~~as delineated in writing~~ by procedurally authorized individuals, ~~holding positions not lower than one management level below the Plant Manager. The Plant Manager will approve plant administrative procedures, Industrial Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures.~~

b. Temporary approval of changes to plant procedures cited in Section 6.8.1 which clearly do not change the intent of the approved procedures, can be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. For changes to plant procedures, which may involve a change in intent of the approved

procedures, the person authorized in Section 6.5.3.1a to approve the procedure shall approve the change.

c. Proposed changes or modifications to plant structures, systems and components shall be reviewed as designated by procedurally authorized individuals. ~~the Plant Manager.~~ Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Implementation of modifications to plant structures, systems and components shall be approved by procedurally authorized individuals. ~~the Plant Manager.~~

d. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Safety Analysis Report shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment and shall be approved by procedurally authorized individuals. ~~the Plant Manager.~~

e. Individuals responsible for reviews performed in accordance with Section 6.5.3.1 a, b, c and d above shall meet or exceed the appropriate qualification requirements of Section 4.2, 4.3.1, 4.4 or 4.6 of ANSI 18.1, 1971, and be previously designated by procedurally authorized individuals. ~~the Plant Manager.~~ Each such review shall include a determination of whether an additional, cross disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.

f. Each review will include a determination of whether prior NRC approval is required pursuant to ~~an unreviewed safety question is involved as defined in~~ 10 CFR 50.59.

6.6 DELETED ~~REPORTABLE EVENT ACTION~~

~~6.6.1 The following actions shall be taken for REPORTABLE EVENTS:~~

~~a. The Commission shall be notified and/or a report submitted pursuant to the requirements of SECTION 50.73 to 10 CFR PART 50, and~~

~~b. Each REPORTABLE EVENT shall be reviewed by the SRB, and the results of this review shall be submitted to the CNRB and the Vice President, Nuclear.~~

FOR INFORMATION ONLY

APPLICABILITY

BASES

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The allowable tolerance for performing surveillance activities is sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval. It is not intended that the allowable tolerance be used as a convenience to repeatedly schedule the performance of surveillances at the allowable tolerance limit.

The allowable tolerance for performing surveillance activities also provides flexibility to accommodate the length of a fuel cycle for surveillances that are specified to be performed at least once each REFUELING INTERVAL. It is the intent that REFUELING INTERVAL surveillances be performed in an OPERATIONAL MODE consistent with safe plant operation.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance inter-

FOR INFORMATION ONLY

APPLICABILITY

BASES

val was exceeded. Completion of the Surveillance Requirement within the allowable (equipment inoperability) outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that may be ~~is~~ subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and ~~is~~, therefore, the ~~a~~ reportable event ~~under the~~ requirements of 10 CFR 50.73(a)(2)(i)(B) should be reviewed for applicability. ~~because it is a condition prohibited by the plant's Technical Specifications.~~

If the allowable (equipment inoperability) outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

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Attachment 2

Environmental Consideration

The FirstEnergy Nuclear Operating Company (FENOC) has determined that the proposed amendment would change requirements with respect to reporting and administrative procedures or requirements. FENOC has evaluated the proposed changes and has determined that the changes do not involve a significant hazards consideration. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22 (c)(10). Therefore, pursuant to 10CFR51.22 (b), an environmental assessment of the proposed change is not required.

Docket Number 50-346
License Number NPF-3
Serial Number 2687
Attachment 3

Proposed Technical Specification Changes

Revision Bar Format

(6 pages follow)

DEFINITIONS

INDEX

ADMINISTRATIVE CONTROLS

1.7 Deleted

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

a. All penetrations required to be closed during accident conditions are either:

   1. Capable of being closed by the Safety Features Actuation System, or

   2. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except those approved to be open under administrative controls,

b. The equipment hatch is closed,

c. Each air lock is in compliance with the requirements of Specification 3.6.1.3,

d. The containment leakage rates are within the limits specified in the Containment Leakage Rate Testing Program, and

e. The sealing mechanism associated with each penetration (e.g., welds, bellows or 0-rings) is OPERABLE.

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

a. Plant procedures required by Section 6.8.1 and changes thereto shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Plant procedures, (including plant administrative procedures), Industrial Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures will be approved by procedurally authorized individuals.

b. Temporary approval of changes to plant procedures cited in Section 6.8.1 which clearly do not change the intent of the approved procedures, can be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. For changes to plant procedures, which may involve a change in intent of the approved

procedures, the person authorized in Section 6.5.3.1a to approve the procedure shall approve the change.

c. Proposed changes or modifications to plant structures, systems and components shall be reviewed as designated by procedurally authorized individuals. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Implementation of modifications to plant structures, systems and components shall be approved by procedurally authorized individuals.

d. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Safety Analysis Report shall be reviewed by an individual/group other than the individual/group which prepared the proposed test or experiment and shall be approved by procedurally authorized individuals.

e. Individuals responsible for reviews performed in accordance with Section 6.5.3.1 a, b, c and d above shall meet or exceed the appropriate qualification requirements of Section 4.2, 4.3.1, 4.4 or 4.6 of ANSI 18.1, 1971, and be previously designated by procedurally authorized individuals. Each such review shall include a determination of whether an additional, cross disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.

f. Each review will include a determination of whether prior NRC approval is required pursuant to 10 CFR 50.59.

6.6 DELETED

val was exceeded. Completion of the Surveillance Requirement within the allowable (equipment inoperability) outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that may be subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and, therefore, the reportable event requirements of 10 CFR 50.73(a)(2)(i)(B) should be reviewed for applicability.

If the allowable (equipment inoperability) outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

Docket Number 50-346
License Number NPF-3
Serial Number 2687
Enclosure 2

COMMITMENT LIST

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS- BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER – REGULATORY AFFAIRS (419-321-8450) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

COMMITMENTS	DUE DATE
NONE	N/A