

Guy G. Campbell
Vice President - Nuclear

419-321-8588
Fax: 419-321-8337

Docket Number 50-346

License Number NPF-3

Serial Number 2701

April 6, 2001

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555-0001

Subject: Request for Alternative to 10 CFR 50.55a(f)(4)(ii), Inservice Testing Requirements:
Relief Request RG-3

Ladies and Gentlemen:

In accordance with the provisions of Title 10 of the Code of Federal Regulations (CFR), Part 50.55a(a)(3)(i), the FirstEnergy Nuclear Operating Company (FENOC) requests authorization from the Nuclear Regulatory Commission (NRC) to use an alternative to the requirements of 10 CFR 50.55a(f)(4)(ii) for the Davis-Besse Nuclear Power Station (DBNPS). This subsection states that licensees must comply with the requirements of the latest edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code incorporated by reference in paragraph (b) of 10 CFR 50.55a on the date 12 months prior to the start of the 120-month interval. FENOC requests an alternative to the Inservice Testing (IST) requirements prescribed for full-stroke exercising active manual valves at the DBNPS.

FENOC has received NRC approval to extend the current DBNPS IST Program interval to February 1, 2002, at which time the IST Program will comply with the requirements of the ASME Code for Operation and Maintenance at Nuclear Power Plants, ASME OM Code-1995 with 1996 Addenda. FENOC also has received NRC approval to incrementally convert the DBNPS IST Program to the requirements of the ASME OM Code-1995 with 1996 Addenda over the extension period.

The ASME OM Code-1995 with 1996 Addenda requires full-stroke exercising of active manual valves each quarter. The DBNPS requests a reduction in the testing frequency and proposes to utilize the requirements of the ASME OM Code-1998 with 1999 Addenda to determine the testing frequency. Other testing required by the ASME OM Code-1995 with 1996 Addenda, such as valve position verification and seat leakage testing, will continue to be performed at their prescribed frequencies.

A047

Document Number 50-346
License Number NPF-3
Serial Number 2701
Page 2

Commitments contained in this submittal are as follows:

- Upon approval of this request by the NRC, the DBNPS will incorporate this alternative to 10 CFR 50.55a(f)(4)(ii) into the IST Program. The DBNPS will change the IST Program testing requirements regarding the frequency of full-stroke exercising of active IST Program manual valves, considering the local conditions of the manual valve that may require the valve to be tested more frequently than once per every 5 years in order to ensure operational readiness.

NRC approval of this alternative to 10 CFR 50.55a(f)(4)(ii) is requested by November 1, 2001.

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,



RMC/s

Attachments

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

Docket Number 50-346
License Number NPF-3
Serial Number 2701
Attachment 1
Page 1 of 2

**RELIEF REQUEST
RG-3**

Reference Regulation: Title 10, Code of Federal Regulations, Part 50, Article 55a, "Codes and Standards," 10 CFR 50.55a(f)(4)(ii), "Inservice Testing Requirements."

Components for Which Alternative is Requested:

Name and Identification Number: Active Inservice Testing (IST) Program manual valves.

Function: Active manual valves are required to perform a specific function in shutting down the reactor to the safe shutdown condition, maintaining the reactor in the safe shutdown condition, or mitigating the consequences of an accident.

Class: ASME Code Class 1, 2, and 3

Regulatory Requirement from Which Alternative is Requested:

10 CFR 50.55a(f)(4)(ii) states:

Inservice tests to verify operational readiness of pumps and valves, whose function is required for safety, conducted during successive 120-month intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed in paragraph (b) of this section.

Compliance with this regulatory requirement requires active IST Program manual valves to be full-stroke exercised once each quarter, as specified in ISTC 4.2 of the ASME OM Code-1995 Edition with 1996 Addenda.

Basis for Relief from Regulatory Requirements:

The information gained by quarterly full-stroke testing of active IST Program manual valves provides no valuable degradation information, and results in valve wear rather than providing assurance of operational readiness. Quarterly testing results in excessive equipment manipulations that can reduce component life and unnecessarily challenge plant equipment, with no corresponding improvement in safety. Assurance of operational readiness can be achieved through less frequent testing.

Proposed Alternative Testing:

Pursuant to 10 CFR 50.55a(a)(3)(i), FENOC proposes an alternative to 10 CFR 50.55a(f)(4)(ii) that would provide an acceptable level of quality and safety for the DBNPS.

Docket Number 50-346
License Number NPF-3
Serial Number 2701
Attachment 1
Page 2 of 2

As an alternative to the referenced regulation, the DBNPS proposes to utilize the requirements of the ASME OM Code-1998 with 1999 Addenda with regard to the frequency of full-stroke exercising of active IST Program manual valves, as cited in the following:

ISTC-3540 Manual Valves. Manual valves shall be full-stroke exercised at least once every 5 years, except where adverse conditions may require the valve to be tested more frequently to ensure operational readiness. Any increased testing frequency shall be specified by the owner. The valve shall exhibit the required change of obturator position.

Implementation Plan:

Upon approval of this request by the NRC, the DBNPS will incorporate this alternative to 10 CFR 50.55a(f)(4)(ii) into the IST Program. The DBNPS will change the IST Program testing requirements regarding the frequency of full-stroke exercising of active IST Program manual valves, considering the local conditions of the manual valve that may require the valve to be tested more frequently than once per every 5 years in order to ensure operational readiness. It is requested that this request for alternative be granted by November 1, 2001.

Docket Number 50-346
License Number NPF-3
Serial Number 2701
Attachment 2
Page 1 of 1

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 associated regulatory commitments.

COMMITMENTS

Upon approval of this request by the NRC, the DBNPS will incorporate this alternative to 10 CFR 50.55a(f)(4)(ii) into the IST Program. The DBNPS will change the IST Program testing requirements regarding the frequency of full-stroke exercising of active IST Program manual valves, considering the local conditions of the manual valve that may require the valve to be tested more frequently than once per every 5 years in order to ensure operational readiness

DUE DATE

Upon approval of request by NRC; scheduled for 11/1/2001