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Docket Number 50-346

License Number NPF-3

Serial Number 2717

June 27, 2001

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

Subject: Revision to Request for Alternative to 10 CFR 50.55a(f)(4)(ii), Inservice Testing Requirements (TAC No. MB1726)

Ladies and Gentlemen:

On April 6, 2001, in FirstEnergy Nuclear Operating Company (FENOC) letter Serial Number 2701, the FENOC requested 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) in accordance with the provisions of Title 10 of the Code of Federal Regulations (CFR), Part 50.55a(a)(3)(i). Subsection 10 CFR 50.55a(f)(4)(ii) 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 has previously received 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 Code for Operation and Maintenance at Nuclear Power Plants, ASME OM Code-1995 with 1996 Addenda. The ASME OM Code-1995 with 1996 Addenda requires full-stroke exercising of active manual valves each quarter.

On May 31, 2001, a telephone conference call was held between the NRC and the DBNPS staffs regarding the April 6, 2001 request. As a result of that call, the DBNPS herewith revises its previous request for a reduction in the testing frequency to once every 18 months with a 25% grace period of the testing frequency to allow for scheduling flexibility. The revised request is attached. This request for alternative is similar to that granted by the NRC for the Millstone Nuclear Power Station, Unit 3 in a Safety Evaluation Report dated February 2, 2001 (TAC Number MA9336, ADAMS Accession Number ML0102302294) in their Relief Request R-4.

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As stated in letter Serial Number 2701, 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,

A handwritten signature in black ink, appearing to read "David H. Lockwood". The signature is fluid and cursive, with a large initial "D" and "L".

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

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RELIEF REQUEST  
RG-3

Amended to include additional supporting information

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 Class 3

Specific Components and Functions Affected by Request:

Service Water valves SW-232, SW-233, SW-234, and SW-236

Type of valves: 1" ASME Class 3 globe valves

Function: Provide a redundant seismic source (through SW-232, SW-233, or SW-234, SW-236 lines) of makeup water to the Component Cooling Water (CCW) Surge Tank in the event of the loss of the non-seismic makeup water source from the Demineralized Water Storage Tank. If the non-seismic source is unavailable and CCW leakage is such that makeup water is necessary, these valves, located in a radiologically restricted area in an overhead requiring access by using ladders, would be manually opened to provide makeup. These valves are not normally operated during power operation.

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 affected manual valves are 1" globe valves that are normally closed and not normally operated during plant operation. The likelihood that the use of these valves would be required is low (the non-seismic makeup source to the CCW Surge Tank would have to be lost and CCW System leakage would have to be such that makeup water to the Surge Tank is needed), and is not desired in that Service Water would be introduced into the CCW System, contaminating the pure water system with raw lake water.

The predominant degradation and failure mechanisms (motor failures, electrical failures, switch settings, etc.) associated with power operated valves do not exist for these valves. Testing these valves on a quarterly frequency solely to meet the requirements of ISTC 4.2 of the ASME OM Code-1995 Edition with 1996 Addenda does not provide any added value. Quarterly testing is unnecessary for detecting degradation of manual valves and does not decrease the potential for component failure. These valves have been successfully tested every two years since November 1994 and every quarter since December 2000 and there have not been any failures in the valves' ability to perform their safety function. The proposed alternate testing will provide an acceptable and comparable level of quality and safety as the current Code required 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 and comparable level of quality and safety for the DBNPS.

As an alternative to the referenced regulation, the DBNPS proposes the following with regard to the frequency of full-stroke exercising of these active IST Program manual valves:

These manual valves shall be full-stroke exercised at least once every 18 months. The 25 percent grace period allowed for other Technical Specification surveillances will be allowed for this frequency to facilitate scheduling of the surveillance due to plant conditions or other constraints.

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 and change the IST Program testing requirements regarding the frequency of full-stroke exercising of these active IST Program manual valves. It is requested that this request for alternative be granted by November 1, 2001.

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### 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 these active IST Program manual valves to at least once every 18 months, with a 25% grace period to facilitate scheduling of the testing due to plant conditions or other constraints.

#### DUE DATE

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