DCR016

Docket No. 50-346

Mr. Richard P. Crouse Vice President, Nuclear Toledo Edison Company Edison Plaza - Stop 712 300 Madison Avenue Toledo, Ohio 43652 Distribution:
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Dear Mr. Crouse:

SUBJECT: AMENDMENT NO. 71 TO FACILITY OPERATING LICENSE NO. NPF-3

The Commission has issued Amendment No. 71 to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. This amendment modifies the Appendix A Technical Specifications in response to your application dated November 5, 1982 (No. 872) as modified by your letter dated July 1, 1983 (No. 961) and Item 5 of your letter dated August 18, 1983 (No. 979).

This amendment modifies Technical Specification Sections 3.0.3 and 4.0.3, and Bases Section 3.0.3. It also adds a new Technical Specification in Section 3.0.5 and Bases Section 3.0.5. Your application for license amendment proposed, in addition to the changes approved herein, the addition of Section 4.0.3.1 which would specify actions required when a surveillance test is missed soley due to administrative error. This proposed change is still under review and is being evaluated as a separate licensing action.

A copy of the Safety Evaluation supporting this amendment is enclosed. Notice of Issuance will be included in the Commission's Monthly Notice.

Sincerely,

**/**S/

George W. Rivenbark, Acting Chief Operating Reactors Branch No. 4 Division of Licensing

Enclosures:

1. Amendment No. 71

2. Safety Evaluation

cc w/enclosures: See next page

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cc w/enclosure(s):

Mr. Donald H. Hauser, Esq. The Cleveland Electric Illuminating Company P. O. Box 5000 Cleveland, Ohio 44101

Gerald Charnoff, Esq. Shaw, Pittman, Potts and Trowbridge 1800 M Street, N.W. Washington, D. C. 20036

Paul M. Smart, Esq. Fuller & Henry 300 Madison Avenue P. 0. Box 2088 Toledo, Ohio 43603

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
7910 Woodmont Avenue, Suite 220
Bethesda, Maryland 20814

President, Board of County Commissioners of Ottawa County Port Clinton, Ohio 43452

Attorney General Department of Attorney General 30 East Broad Street Columbus, Ohio 43215

Harold Kohn, Staff Scientist Power Siting Commission 361 East Broad Street Columbus, Ohio 43216 U.S. Nuclear Regulatory Commission Resident Inspector's Office 5503 N. State Route 2 Oak Harbor, Ohio 43449

Regional Radiation Representative EPA Region V 230 South Dearborn Street Chicago, Illinois 60604

Ohio Department of Health ATTN: Radiological Health Program Director P. O. Box 118 Columbus, Ohio 43216

James W. Harris, Director (Addressee Only) Division of Power Generation Ohio Department of Industrial Relations 2323 West 5th Avenue P. O. Box 825 Columbus, Ohio 43216

Mr. James G. Keppler, Regional Administrator U. S. Nuclear Regulatory Commission, Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

Mr. Robert F. Peters Manager, Nuclear Licensing Toledo Edison Company Edison Plaza 300 Madison Avenue Toledo, Ohio 43652



# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

WASHING FOIN, D. C. 20555

#### THE TOLEDO EDISON COMPANY

AND

#### THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DOCKET NO. 50-346

#### DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

#### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 71 License No. NPF-3

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by The Toledo Edison Company and The Cleveland Electric Illuminating Company (the licensees) dated November 5, 1982, as revised July 1, 1983 and August 18, 1983, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-3 is hereby amended to read as follows:

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#### <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 71, are hereby incorporated in the license. Toledo Edison Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Rivenbark, Acting Chief Operating Reactors Branch No. 4

Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: July 18, 1984

#### ATTACHMENT TO LICENSE AMENDMENT NO. 7]

#### FACILITY OPERATING LICENSE NO. NPF-3

#### DOCKET NO. 50-346

Replace the following page of the Appendix "A" Technical Specifications with the enclosed page as indicated. The revised page is identified by Amendment number and contains a vertical line indicating the area of change. The corresponding overleaf page is also provided to maintain document completeness.

Page

3/4 0-1 B 3/4 0-1

Add pages B 3/4 0-1a B 3/4 0-1b

## 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEIL ANCE REQUIREMENTS

#### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

- 3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification.
- 3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.
- 3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, action shall be initiated within I hour to place the unit in a MODE in which the Specification does not apply to placing it, as applicable, in:
  - 1. At least HOT STANDBY within 6 hours,
  - 2. At least HOT SHUTDOWN within the following 6 hours, and
- 3. At least COLD SHUTDOWN within the subsequent 24 hours. Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.
- 3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.
- 3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, within 2 hours action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it as applicable in:
  - 1. At least HOT STANDBY within 6 hours,
  - 2. At least HOT SHUTDOWN within the following 6 hours, and
  - 3. At least COLD SHUTDOWN within the subsequent 24 hours.

This Specification is not applicable in MODES 5 or 6.

#### SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be applicable during the OPERA-TIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:
  - a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
  - b. A total maximum combined interval time for any 3 consecutive tests not to exceed 3.25 times the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.
- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:
  - a. During the time period:
    - 1. From issuance of the Facility Operating License to the start of facility commercial operation, inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vesel Code 1974 Edition, and Addenda through Summer 1975, except where specific written relief has been granted by the Commission.
    - 2. Following start of facility commercial operation, inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
  - b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

#### SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be applicable during the OPERA-TIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:
  - a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
  - b. A total maximum combined interval time for any 3 consecutive tests not to exceed 3.25 times the specified surveillance interval.
- 4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.
- 4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:
  - a. During the time period:
    - 1. From issuance of the Facility Operating License to the start of facility commercial operation, inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vesel Code 1974 Edition, and Addenda through Summer 1975, except where specific written relief has been granted by the Commission.
    - 2. Following start of facility commercial operation, inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
  - b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

The specifications of this section provide the general requirements applicable to each of the Limiting Conditions for Operation and Surveillance Requirements within Section 3/4.

- 3.0.1 This specification defines the applicability of each specification in terms of defined OPERATIONAL MODES or other specified conditions and is provided to delineate specifically when each specification is applicable.
- 3.0.2 This specification defines those conditions necessary to constitute compliance with the terms of an individual Limiting Condition for Operation and associated ACTION requirement.
- 3.0.3 This specification delineates the ACTION to be taken for circumstances not directly provided for in the ACTION statements and whose occurrence would violate the intent of the specification. For example, Specification 3.5.1 requires each Reactor Coolant System core flooding tank to be OPERABLE and provides explicit ACTION requirements if one tank is inoperable. Under the terms of the Specification 3.0.3, if more than one tank is inoperable, the unit is required to be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours. As a further example, Specification 3.6.2.1 requires two Containment Spray Systems to be OPERABLE and provides explicit ACTION requirements if one spray system is inoperable: Under the terms of Specification 3.0.3, if both of the required Containment Spray Systems are inoperable, the unit is required to be in at least HOT STANDBY within 6 hours, in at least HOT SHUTDOWN within the following 6 hours, and in at least COLD SHUTDOWN in the following 24 hours. It is assumed that the unit is brought to the required MODE within the required times by promptly initiating and carrying out the appropriate ACTION statement.
- 3.0.4 This specification provides that entry into an OPERATIONAL MODE or other specified applicability condition must be made with (a) the full complement of required systems, equipment or components OPERABLE and (b) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out of service provisions contained in the ACTION statements.

The intent of this provision is to insure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

3.0.5 This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the ACTION statements for power sources, when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the ACTION statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the ACTION statements of the associated electrical power source. It allows operation to be governed by the time limits of the ACTION statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual ACTION statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.8.1.1 requires in part that two emergency diesel generators be OPERABLE. The ACTION statement provides for a 72-hour out-ofservice time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding normal power source must be OPERABLE, and all redundant systems, subsystems, trains, components, and devices must be OPERABLE, or otherwise satisfy Specification 3.0.5 (i.e., be capable of performing their design function and have at least one normal or one emergency power source OPERABLE). If they are not satisfied, action is required in accordance with this specification.

As a further example, Specification 3.8.1.1 requires in part that two physically independent circuits between the offsite transmission network and the onsite Class IE distribution system be OPERABLE. The ACTION statement provides a 24-nour out-of-service time when both required offsite circuits are not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5. all systems, subsystems, trains, components and devices supplied by the inoperable normal power sources, both of the offsite circuits, would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable normal power sources instead, provided the

3.0.5 This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the ACTION statements for power sources, when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the ACTION statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the ACTION statements of the associated electrical power source. It allows operation to be governed by the time limits of the ACTION statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual ACTION statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.8.1.1 requires in part that two emergency diesel generators be OPERABLE. The ACTION statement provides for a 72-hour out-ofservice time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding normal power source must be OPERABLE, and all redundant systems, subsystems, trains, components, and devices must be OPERABLE, or otherwise satisfy Specification 3.0.5 (i.e., be capable of performing their design function and have at least one normal or one emergency power source OPERABLE). If they are not satisfied, action is required in accordance with this specification.

As a further example, Specification 3.8.1.1 requires in part that two physically independent circuits between the offsite transmission network and the onsite Class IE distribution system be OPERABLE. The ACTION statement provides a 24-nour out-of-service time when both required offsite circuits are not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5. all systems, subsystems, trains, components and devices supplied by the inoperable normal power sources, both of the offsite circuits, would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable normal power sources instead, provided the

#### **APPLICABILITY**

#### BASES

other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE. In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.



## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. NPF-3

#### TOLEDO EDISON COMPANY

AND

## CLEVELAND ELECTRIC ILLUMINATING COMPANY

### DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1

#### DOCKET NO. 50-346

#### Introduction

By letter dated November 5, 1982 and modified by letters dated July 1 and August 18, 1983, Toledo Edison Company (TED) transmitted a Technical Specification Change Request to amend Appendix A of Facility Operating License NPF-3. The change under consideration is Item 5 of the last submittal which modifies Sections 3.0.3 and 4.0.3 and adds Section 3.0.5. The safety function of Section 3.0.3 and 3.0.5 is to provide for shutdown of the unit due to equipment inoperability which places the plant outside the Limiting Condition for Operation (LCO) and into applicable Action Statements. Section 4.0.3 provides guidance in the determination of equipment/system operability in the event of missed surveillance tests.

#### **Evaluation**

Section 3.0.3 of the Davis-Besse Technical Specifications (TSs) requires the plant to be placed in Hot Standby (Mode 3) within one hour of the time that an LCO and/or associated action requirements cannot be satisfied. The Babcock and Wilcox Standard Technical Specifications (STS), NUREG-0103, Rev. 4, requires that action be initiated in one hour to place the plant into Hot Standby within the next six hours, into Hot Shutdown in the following six hours, and into Cold Shutdown within the subsequent 24 hours. TECo proposes to use the STS paragraph to replace Section 3.0.3 since the plant cannot be shutdown from high power levels to the Hot Standby Mode in a controlled manner within one hour. The proposed action times are identical with those in the STS except TED elected to change 3.0.3.1 to read, "At least Hot Standby within 6 hours" in place of "At least Hot Standby within the next 6 hours", thus requiring the time to Hot Standby to be 6 hours as compared to 7 hours required by STS. The proposed change is in the conservative direction from STS.

On August 31, 1983, EG&G Idaho provided a Technical Evaluation Report (TER) of the licensee submittal of July 1, 1983. The report concludes that the proposed amendment provides adequate clarification of the term OPERABLE as it applies to engineered safety features systems to support system outages of redundant components.

8408020174 840709 PDR ADDCK 05000346 PDR Section 4.0.3 provides guidance in the determination of equipment/system operability in the event of missed surveillance tests. The proposed modification to Section 4.0.3 makes Section 4.0.3 identical to that in the B&W STS. TED proposes to add 4.0.3.1 to this section clarifying the actions required when a surveillance with monthly frequency or greater is missed due to administrative error. The addition of Section 4.0.3.1 will be reviewed and evaluated in a separate action.

We concur with the conclusions of the TER and agree that the proposed changes clarify the TSs and do not compromise safety of the plant. Therefore, the proposed changes are acceptable.

#### Environmental Consideration

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. We have determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 18, 1984

Principal contributor: K. R. Ridgway