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

May 1, 1991

Docket No. 50-346

Posted
Basis Change to NPF-3

Mr. Donald C. Shelton
Vice President, Nuclear - Davis-Besse
Centerior Service Company
Toledo Edison Company
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Shelton:

SUBJECT: BASES CHANGES TO TECHNICAL SPECIFICATION 3/4.7.1.3 FOR FACILITY OPERATING LICENSE NO. NPF-3 (TAC NO. 79671)

By letter dated February 15, 1991, you submitted a proposed administrative change to the Davis-Besse Nuclear Power Station (DBNPS) Technical Specification (TS) Bases 3/4.7.1.3. The purpose of the change is to make the bases consistent with the Updated Safety Analysis Report (USAR), NUREG-0136 (Safety Evaluation Report Related to Operation of DBNPS, Unit 1, December 1976), and the NRC staff safety evaluation approving Toledo Edison's response to Generic Letter 81-21.

As stated in 10 CFR 50.36(a), the bases for the specifications shall be included, but shall not become part of the technical specifications. Therefore, changes to the bases may be made separately from changes to the technical specifications.

The proposed change to the TS bases for the condensate storage tanks will clarify that the minimum water volume will ensure that the tanks have sufficient water to maintain the reactor coolant system (RCS) under normal conditions (i.e., no loss of offsite power in hot shutdown or cooldown). This will allow the plant to maintain hot standby conditions for 13 hours with steam discharge to the atmosphere and to cool down the RCS to less than 280°F.

You stated in previous correspondence that natural circulation cooldown was supported for: 1) 34 hours assuming the condensate storage tanks contained the TS minimum volume of 250,000 gallons, and 2) 72 hours with both condensate storage tanks filled to a level corresponding to the low level setpoint. The response also stated that the time required to cool the RCS to decay heat removal (DHR) entry conditions, assuming a loss of offsite power and a cooldown rate of 1-½°F per hour, was approximately 150-200 hours. Upon depletion of the inventory in the condensate storage tanks, additional cooling water capacity to support auxiliary feedwater system operation during natural circulation cooldown would be provided by the seismic Category I service water system, which has Lake Erie as its source. The

switchover to the service water system is automatic on auxiliary feedwater pump low suction pressure. Based on the information provided, the staff finds the proposed clarification to be acceptable.

The revised TS Bases page number B 3/4 7-2 is enclosed with this letter.

Sincerely,

Original Signed By:

James R. Hall, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
Revised TS Page B 3/4 7-2

cc w/enclosure: See next page

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DOCUMENT NAME: 79671-TS BASES

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3/4.7.1.2 AUXILIARY FEEDWATER SYSTEMS (Continued)

Following any modifications or repairs to the Auxiliary Feedwater System piping from the Condensate Storage Tank through auxiliary feed pumps to the steam generators that could affect the system's capability to deliver water to the steam generators, following extended cold shutdown, a flow path verification test shall be performed. This test may be conducted in MODES 4, 5 or 6 using auxiliary steam to drive the auxiliary feed pumps turbine to demonstrate that the flow path exists from the Condensate Storage Tank to the steam generators via auxiliary feed pumps.

Verification of the turbine plant cooling water valves (CW 196 and CW 197), the startup feedwater pump suction valves (FW 32 and FW 91), and the startup feedwater pump discharge valve (FW 106) in the closed position is required to address the concerns associated with potential pipe failures in the auxiliary feedwater pump rooms, that could occur during operation of the startup feedwater pump.

3/4.7.1.3 CONDENSATE STORAGE FACILITIES

The OPERABILITY of the Condensate Storage Tank with the minimum water volume ensures that sufficient water is available to maintain the RCS at HOT STANDBY conditions for 13 hours with steam discharge to atmosphere and to cooldown the Reactor Coolant System to less than 280° under normal conditions (i.e., no loss of offsite power). The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics.

3/4.7.1.4 ACTIVITY

The limitations on secondary system specific activity ensure that the resultant offsite radiation dose will be limited to a small fraction of 10 CFR Part 100 limits in the event of a steam line rupture. This dose includes the effects of a coincident 1.0 GPM primary to secondary tube leak in the steam generator of the affected steam line. These values are consistent with the assumptions used in the safety analyses.

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blowdown in the event of a steam line rupture. This restriction is required to 1) minimize the