

October 5, 1998

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Mr. John K. Wood  
 Vice President - Nuclear, Davis-Besse  
 Centerior Service Company  
 c/o Toledo Edison Company  
 Davis-Besse Nuclear Power Station  
 5501 North State Route 2  
 Oak Harbor, OH 43449-9760

SUBJECT: AMENDMENT NO. 227 TO FACILITY OPERATING LICENSE NO. NPF-3 -  
 DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1 (TAC NO. M98521)

Dear Mr. Wood:

The Commission has issued the enclosed Amendment No. 227 to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. The amendment revises the Technical Specifications (TSs) in response to your application dated April 18, 1997, as supplemented by letters dated October 10, 1997, and February 27 and September 8, 1998.

This amendment revises TS Section 3/4.7.6, "Plant Systems - Control Room Emergency Ventilation System," and the associated bases. Action statements have been added related to the availability of the station vent normal range radiation monitoring instrumentation. In addition, the bases have been modified consistent with these changes.

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original Signed by

Allen G. Hansen, Project Manager  
 Project Directorate III-3  
 Division of Reactor Projects III/IV  
 Office of Nuclear Reactor Regulation

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 PDR ADOCK 05000346  
 P PDR

Docket No. 50-346

- Enclosures: 1. Amendment No. 227 to  
 License No. NPF-3  
 2. Safety Evaluation

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*12/27/98*

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Sincerely,

Allen G. Hansen, Project Manager  
 Project Directorate III-3  
 Division of Reactor Projects III/IV  
 Office of Nuclear Reactor Regulation

Docket No. 50-346

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 5, 1998

Mr. John K. Wood  
Vice President - Nuclear, Davis-Besse  
Centerior Service Company  
c/o Toledo Edison Company  
Davis-Besse Nuclear Power Station  
5501 North State Route 2  
Oak Harbor, OH 43449-9760

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A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen G. Hansen".

Allen G. Hansen, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosures: 1. Amendment No. 227 to  
License No. NPF-3  
2. Safety Evaluation

cc w/encls: See next page

John K. Wood  
Toledo Edison Company

Davis-Besse Nuclear Power Station, Unit 1

cc:

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President, Board of County  
Commissioners of Ottawa County  
Port Clinton, OH 43252



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TOLEDO EDISON COMPANY  
CENTERIOR SERVICE 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. 227  
License No. NPF-3

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Toledo Edison Company, Centerior Service Company, and The Cleveland Electric Illuminating Company (the licensees) dated April 18, 1997, as supplemented by letters dated October 10, 1997, and February 27 and September 8, 1998, 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.
2. 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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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 227 , are hereby incorporated in the license. The 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 and shall be implemented not later than 120 days after issuance.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Allen G. Hansen, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of issuance: October 5, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 227

FACILITY OPERATING LICENSE NO. NPF-3

DOCKET NO. 50-346

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove

3/4 7-17  
3/4 7-18  
- - - -

Insert

3/4 7-17  
3/4 7-18  
B 3/4 7-4a

## PLANT SYSTEMS

### 3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.7.6.1 Two independent control room emergency ventilation systems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one control room emergency ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one channel of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, restore the inoperable channel to OPERABLE status, or isolate the control room normal ventilation system and place at least one control room emergency ventilation system train in operation within 7 days.
- c. With both channels of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, within 1 hour, isolate the control room normal ventilation system and place at least one control room emergency ventilation system train in operation.

#### SURVEILLANCE REQUIREMENTS

---

4.7.6.1 Each control room emergency ventilation system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 110°F when the control room emergency ventilation system is operating.
- b. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
- c. At least once each REFUELING INTERVAL or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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1. Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 3300 cfm  $\pm 10\%$ ;
  2. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a\* of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 1%; and
  3. Verifying a system flow rate of 3300 cfm  $\pm 10\%$  during system operation when tested in accordance with ANSI N510-1980.
- d. After every 720 hours of charcoal adsorber operation by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a\* of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 1%.
- e. At least once each REFUELING INTERVAL by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 4.4 inches Water Gauge while operating the system at a flow rate of 3300 cfm  $\pm 10\%$ ;
  2. Verifying that the control room normal ventilation system is isolated by a SFAS test signal and a Station Vent Normal Range Radiation Monitoring test signal; and

\* The test is performed in accordance with ASTM D 3803-1979 with the following conditions: 1) equilibrate for 16 hours at 30°C/70% relative humidity (RH), 2) challenge for 2 hours at 30°C/70% RH, 3) elution for 2 hours at 30°C/70% RH.

## PLANT SYSTEMS

### BASES

---

The Station Vent Normal Range Radiation Monitoring isolation function provides that under the required conditions, an isolation signal will be given. The Station Vent Normal Range Radiation Monitors provide isolation and shutdown of the control room normal ventilation system.

With one or both channels of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, the provisions of Action statements b or c, respectively, are applicable. The provisions of Action statement a are not applicable.

Under the Action statements for inoperable Station Vent Normal Range Radiation Monitoring instrumentation, should the control room normal ventilation system be isolated and at least one train of the control room emergency ventilation system be placed in operation, these systems would be in a state equivalent to that which they would be in following an actual high radiation condition. Plant operation can continue indefinitely in this state, provided that control room temperature can be maintained in an acceptable range, with the control room emergency ventilation system obtaining fresh-air makeup as described in the Updated Safety Analysis Report Section 9.4.1, "Control Room."

Surveillance Requirement 4.7.6.1.e.2 requires verification that the control room normal ventilation system can be isolated by a Station Vent Normal Range Radiation Monitoring test signal.

Additional testing requirements for the Station Vent Normal Range Radiation Monitoring instrumentation are provided in the ODCM for gaseous effluent releases.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 227 TO FACILITY OPERATING LICENSE NO. NPF-3  
TOLEDO EDISON COMPANY  
CENTERIOR SERVICE COMPANY  
AND  
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1  
DOCKET NO. 50-346

1.0 INTRODUCTION

By letter dated April 18, 1997, as supplemented by letters dated October 10, 1997, and February 27 and September 8, 1998, Toledo Edison Company, Centerior Service Company, and The Cleveland Electric Illuminating Company (the licensees), submitted a request for changes to the Davis-Besse Nuclear Power Station, Unit No. 1, Technical Specifications (TSs).

The proposed amendment would revise TS Section 3/4.7.6, "Plant Systems - Control Room Emergency Ventilation System," and the associated bases. Action statements would be added related to the availability of the station vent normal range radiation monitoring instrumentation. In addition, the bases would be modified consistent with these changes.

2.0 BACKGROUND

Control room ventilation is discussed in the Davis-Besse Updated Safety Analysis Report (USAR), Section 9.4, "Air Conditioning, Heating, Cooling, and Ventilation." The station vent radiation monitoring system is discussed in USAR Section 11.4, "Process and Effluent Radiological Monitoring Systems." Additional information on control room ventilation is provided in USAR Appendix 3D.1.15, "Criterion 19 - Control Room."

As stated in USAR Section 9.4, the control room normal ventilation system consists of redundant air-handling units with heating and cooling coils. Normally, one unit operates while the other unit is available for manual actuation if the operating unit fails.

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Control room normal ventilation system isolation and shutdown on high station vent radiation provide an enclosed environment from which the unit can be operated following an uncontrolled release of radioactivity. The high radiation isolation function provides assurance that under the required conditions, an isolation signal will be given. This signal is derived from one of the two redundant radiation monitors in the station vent (the operability of these monitors is verified through surveillance testing specified in plant procedures). Two redundant dampers in series are provided in each primary ventilation system duct. Each redundant damper is controlled by a signal derived from one of the redundant radiation monitors so that a single failure will not prevent the system from isolating.

Each of the two independent control room emergency ventilation systems (CREVS) consists of a 100% capacity redundant fan-filter assembly together with a cooling coil and water-cooled condensing unit. A 100% capacity redundant air-cooled condensing unit is provided as a backup to the water-cooled condensing unit for each CREVS. The CREVS is an emergency system. After normal ventilation system isolation, the CREVS can be manually started, as appropriate, to provide a protected environment from which operators can control the unit.

### 3.0 EVALUATION

Currently, if one channel of station vent normal radiation monitoring instrumentation becomes inoperable during plant operation, one of the two CREVS systems is considered to be inoperable, and the CREVS limiting condition for operation (LCO, TS 3.7.6.1) provides a 7-day period to restore operability or initiate a plant shutdown.

If both channels of station vent normal radiation monitoring instrumentation become inoperable during plant operation, then both CREVS systems are considered to be inoperable, and TS 3.0.3 requires that a plant shutdown be initiated within one hour.

The licensees are proposing to modify the CREVS TSs (Section 3/4.7.6) by revising the required actions in the event that one or both channels of station vent normal radiation monitoring instrumentation become inoperable. With these new actions in place, a plant shutdown due solely to a loss of the subject instrumentation can be avoided.

#### 3.1 TS 3.7.6.1 Action Statement

The TS 3.7.6.1 Action Statement currently reads:

With one control room emergency ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The licensees propose to number this action statement "a." Since this is an administrative change only, it is acceptable.

### 3.2 TS 3.7.6.1.b Action Statement

The licensees propose to add the following action statement:

- b. With one channel of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, restore the inoperable channel to OPERABLE status, or isolate the control room normal ventilation system and place at least one control room emergency ventilation system train in operation within 7 days.

As stated in Section 3.0, the current Davis-Besse TSs require a plant shutdown to be initiated in 7 days if one channel of station vent monitoring instrumentation is inoperable and cannot be restored. The proposed TS would not require a plant shutdown. Instead, it would require the licensees to restore the inoperable instrumentation, or isolate the control room normal ventilation system and place at least one CREVS train in operation within 7 days.

The 7-day requirement to isolate the normal ventilation system and place at least one CREVS train in operation places the plant in the mode required if there was a radioactive release through the station vent. This is consistent with the TS action if an actual high radiation signal was received (providing for CREVS operation even though a release has not been identified). Since this addition adds conservative requirements which are consistent with the current operating practice at Davis-Besse, and since the potential for an unnecessary plant transient is reduced, the proposed change is acceptable.

### 3.3 TS 3.7.6.1.c Action Statement

The licensees propose to add the following action statement:

- c. With both channels of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, within 1 hour, isolate the control room normal ventilation system and place at least one control room emergency ventilation system train in operation.

This TS would require that, with both channels of normal range radiation monitoring instrumentation inoperable, at least one control room emergency ventilation system train be placed in operation, whereas most plant designs normally require that one train be placed in operation in the emergency recirculation mode. The licensees documented in the October 10, 1997, submittal that this difference is necessary to account for the operational scenario at Davis-Besse. USAR Section 9.4.1.3 describes the scenario:

For the first four days following LOCA [loss of coolant accident], the control room will be isolated and the ... CREVS will be operated in the total recirculation mode (3300 cfm). On the fourth day, the CREVS mode will be switched to take 300 cfm fresh-air makeup while recirculating 3000 cfm. This enables the control room to be maintained at a one-eighth inch w.g. [water gauge] higher pressure than the other areas of the auxiliary building.

This operational difference is consistent with the accident analysis for Davis-Besse, and ensures that the control room will be habitable if an uncontrolled release of radioactivity occurs while the instrumentation is inoperable. The accident dose analysis is not affected by this change.

Since the proposed change is consistent with current Davis-Besse operations, since the accident dose analysis is not affected, and since the potential for an unnecessary plant transient is reduced, the proposed change is acceptable.

### 3.4 TS 4.7.6.1.e.2 Surveillance Requirement

The licensees propose to change the wording of the reference to the "...Station Vent Normal Radiation High test signal..." in the subject surveillance requirement. The new requirement would read:

2. Verifying that the control room normal ventilation system is isolated by a SFAS test signal and a Station Vent Normal Range Radiation Monitoring test signal; and

This is an administrative change only to make the terminology consistent with the new action statements discussed above in Sections 3.2 and 3.3. Therefore, it is acceptable.

### 3.5 TS Bases 3/4.7, "Plant Systems"

The licensees propose to add the following paragraphs to this bases section:

The Station Vent Normal Range Radiation Monitoring isolation function provides that under the required conditions, an isolation signal will be given. The Station Vent Normal Range Radiation Monitors provide isolation and shutdown of the control room normal ventilation system.

With one or both channels of Station Vent Normal Range Radiation Monitoring instrumentation inoperable, the provisions of Action statements b or c, respectively, are applicable. The provisions of Action statement a are not applicable.

Under the Action statements for inoperable Station Vent Normal Range Radiation Monitoring instrumentation, should the control room normal ventilation system be isolated and at least one train of the control room emergency ventilation system be placed in operation, these systems would be in a state equivalent to that which they would be in following an actual high radiation condition. Plant operation can continue indefinitely in this state, provided that control room temperature can be maintained in an acceptable range, with the control room emergency ventilation system obtaining fresh-air makeup as described in the Updated Safety Analysis Report Section 9.4.1, "Control Room."

Surveillance Requirement 4.7.6.1.e.2 requires verification that the control room normal ventilation system can be isolated by a Station Vent Normal Range Radiation Monitoring test signal.

Additional testing requirements for the Station Vent Normal Range Radiation Monitoring instrumentation are provided in the ODCM for gaseous effluent releases.

These bases paragraphs provide additional information about the station vent radiation monitoring instrumentation and the control room ventilation systems. Since these paragraphs are consistent with the proposed TSs, they are acceptable. Note that the last sentence of the second paragraph states, "The provisions of Action statement a are not applicable." The inapplicability of "Action statement a" only applies to the effect of inoperable station vent normal range radiation monitoring instrumentation on "Action statement a." That is, if this instrumentation is inoperable, it does not affect the operability of the CREVS.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Ohio State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (62 FR 30646). The supplemental information submitted by letters dated October 10, 1997, and September 8, 1998, did not affect the proposed no significant hazards consideration. However, the supplemental letter dated February 27, 1998, included a new analysis of the issue of no significant hazards consideration. Based on this, the Commission issued a new proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 25117). Accordingly, the 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 the amendment.

6.0 CONCLUSION

The staff has 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; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: A. Hansen

Date: October 5, 1998