

# **FENOC**

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United States Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Subject: Regulatory Commitment Change Summary Report (May 18, 2000 - May 18, 2002)

Ladies and Gentlemen:

The FirstEnergy Nuclear Operating Company (FENOC) hereby submits the attached Regulatory Commitment Change Summary Report for the Davis-Besse Nuclear Power Station, Unit Number 1 (DBNPS), pursuant to the Nuclear Energy Institute (NEI) document, "Guideline for Managing NRC Commitments," Revision 2, dated December 19, 1995. DBNPS adopted the above guideline with a revision to the Commitment Management procedure effective April 1, 1996.

The DBNPS commitment changes identified between the dates of May 18, 2000 and May 18, 2002 are included in Attachment 1 of this report. This report includes a description of the identified commitments, a summary of the changes made to the commitments, and a brief statement describing the basis for the change. The DBNPS has reviewed and implemented the commitment changes in accordance with the NEI document, "Guideline for Managing NRC Commitments." Per this guideline, DBNPS has determined that the submittal of this report is the only required notification regarding changes to commitments listed in the attached summary.

Also included in this report are six commitment changes recently identified that should have been included in the Regulatory Commitment Change Summary Report (Serial 2575) submitted on November 20, 1998. They are summarized in Attachment 2 to this report.

If you have any further questions concerning this matter, please contact Mr. Patrick McCloskey, Manager - Regulatory Affairs at (419) 321-8450.

Sincerely yours,



RJS/bw

Attachments

cc: J. B. Hopkins, DB-1 NRC/NRR Senior Project Manager  
J. E. Dyer, Regional Administrator, USNRC Region III  
C. S. Thomas, DB-1 NRC Senior Resident Inspector  
Utility Radiological Safety Board

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 COMMITMENT CHANGE SUMMAY REPORT  
 MAY, 2000 - MAY, 2002

Commitment Number / Source / Date	Commitment Description	Change	Reason for Change
O01256 LER 82-057, Rev 1 07/06/1984	Door 400 (Spent Fuel Pool EVS negative pressure boundary) was found not completely closed and latched due to personnel error. Corrective Action was to have all sign a page in a "Basic Security Procedures" document stating they are responsible for ensuring plant doors close behind them.	This commitment is closed. The "Basic Security Procedure" signature page stating station personnel are responsible for ensuring plant doors close behind them has been superceded by other program requirements and can be cancelled.	This requirement is discussed as part of training received for Protected Area Access. This commitment is unnecessary based on the quality of this training and the maturity of the Access Authorization Program.
O01275 LER 83-012 Rev. 2 05/05/83	Procedures are in place to ensure that if one ECCS Room Cooler (or one ECCS Cooler in each room) is isolated, that the Service Water temperature is less than or equal to 75 degrees Fahrenheit.	Procedures specify isolating/draining a single ECCS Room Cooler for a given ECCS Room will render an associated Train of ECCS components (DH/LPI/HPI & CTMT Spray) inoperable unless Service Water temperature is below specified values and other specified conditions are acceptable.	Revised procedural guidance to incorporate licensing basis assumptions of License Amendment 242, which increased the maximum Service Water temperature from 85 degrees Fahrenheit to 90 degrees Fahrenheit.
O03558 Log 1-0401 01/06/1984	Prohibit suspension of a work order.	Commitment closed.	The site procedures and the work order software do not provide or allow an option to suspend a work order.

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O04239 Serial 1-1033 01/28/1994	Maintain PM activities for applicable Agastat relays with appropriate replacement frequency.	Delete PM activities requiring the replacement of the Agastat relays for electrical schemes AC108, AC113, AD108 & AD113.	A modification removed the Agastat relays for electrical schemes AC108, AC113, AD108 & AD113 from the plant. Since the relays have been removed, the PMs are no longer applicable.
O08625 LER 88-008 04/08/1988	Maintain a list of qualified design reviewers.	Commitment closed. Maintenance of a separate list of qualified reviewers is not administratively necessary.	A formal training program is now in effect to ensure engineers assigned design review responsibility meet job specific qualifications. It is the responsibility of the Engineering Supervisor to ensure the assigned reviewer is qualified for the task assigned.
O12223 SERIAL 1-0645 08/14/1986	Verify the CAC fans are discharging air in slow speed to show it is running in the proper direction. Air flow is determined by monitoring CAC plenum pressure.	Revise commitment to permit alternate means of verifying airflow (e.g., plenum pressure, motor current, differential temperatures, or other methods).	Permit alternate means of verifying airflow if plenum pressure transmitter fails during power operations. Subsequent maintenance on the failed plenum pressure transmitter would require an "at power" containment entry in a high radiation area. This is unnecessary as alternate means exist to verify the CACs are operating properly.

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O13608 IR 84-015 (Log 1-0490) 01/14/1985	Changes to drawings contained in the FSAR should be subject to 10CFR50.59 evaluation	Commitment closed.	Commitment was initiated due to oversight by personnel in early 1980's. Consideration that an evaluation is required for changes to USAR Drawings is now implicit in the fact that the drawings are part of the USAR.
O13660/O13661 Serial 1-0526 5/17/1985	Category A valve leak rate test program meets the requirements of ASME Section XI, IWV-3426 and IWV-3427.	Commitments have been superseded by new requirements and, therefore, are closed.	The Third Ten Year ASME IST Program follows the 1995 Edition, 1996 Addenda of the OM Code for valve leak testing.
O13663 IR 87-004 (Log 1-1600) 05/08/1987	Provide procedural requirement that a copy of all 10CFR50.59 safety evaluations be provided to Nuclear Licensing Manager for incorporation into annual report to NRC.	Commitment closed.	Standardization and improved efficiency of work process. A web page has been established for electronic filing and retrieval of 50.59 evaluations from which RA is able to retrieve copies of all required safety evaluations.

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O13771 Serial 1231 01/03/1986	PM program provides: New, revised or deleted PM items (PMAs) are approved by designated engineer, maintenance planner or supervisor work control; deferrals for PM items (PMDs) which do not exceed 125% performance window are approved by supervisor work control or discipline maintenance superintendent; deferrals for PM items which allow the item to exceed the 125% performance window are approved by plant operations manager or plant maintenance manager.	Changes to the PM approval levels are as follows: New, revised or deleted PM items - designated engineer or maintenance planner or PM Coordinator (EQRL Engineer); deferrals for PM items which do not exceed 125% performance window - N/A; deferrals for PM items which allow the item to exceed the 125% performance window - plant operations manager or discipline maintenance superintendent.	Changes in the review/approval level is based upon past performance of the PM program. Deferrals for the last 2 years have been less than the maximum goal and no deferrals past the grace period (>125%) have been submitted since 1999.
O13930 IR 88-006 (Log 1-1783) 04/20/1988	Perform calibration of PZR code safety valves and PORV under hot conditions. Pressure gauge used to determine lift setpoint to have an accuracy of plus or minus 0.1% and a corresponding error of 5 psi.	The pressure gauge used to determine the lift setpoint will meet current OMa Code or ASME XI requirements used by DBNPS.	Conformance with current Code requirements. The old Code gave no tolerance. The new Code gives a tolerance that is less stringent but adequate to ensure that testing requirements are met.

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O14906 Serial 1-0501 02/28/1985	The Emergency Planning Activity Scheduling System will be used to identify and maintain commitments, required activities, routing activities and correction of action items.	Procedure specifies activities that will be tracked in the Emergency Planning Activity Scheduling System and specifies activities involving corrective actions to be tracked in the DBNPS corrective action program.	To permit evaluation and tracking of Emergency Preparedness related "conditions adverse to quality" in the DBNPS Condition Report system similar to other identified conditions adverse to quality.
O15078 Serial 1685 07/31/1989	Main Steam Line Room smoke detectors are verified for operability every 18 months and when the unit has been shutdown for maintenance.	Commitment closed.	A modification abandoned these Main Steam line Room smoke detectors.
O15085 Serial 1-0501 02/28/1985	The Emergency Planning Activity Scheduling System will be used to track all Emergency Preparedness activities including NRC and INPO commitments, drill and exercise critique items, required performance tests, required training, and Quality Assurance audit finding reports.	Procedure specifies activities that will be tracked in the Emergency Planning Activity Scheduling System and specifies activities involving corrective actions to be tracked in the DBNPS corrective action program.	To permit evaluation and tracking of Emergency Preparedness related "conditions adverse to quality" in the DBNPS Condition Report system similar to other identified conditions adverse to quality.

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O15277 Serial 1685 7/31/1989	Sample the Diesel Fire Pump lubricating oil monthly to meet the intent of standard NFPA 13A 1981, 2-4.1.6. The oil is changed at 18-month intervals instead of annually as specified in the standard.	Eliminated monthly sampling of the lubricating oil of the Diesel Fire Pump. Oil is now replaced every 12 months.	Actions changed to be in compliance with standard NFPA 13A 1982, 2-4.1.6.
O15554/O15555 GL 89-013 (Log 2997) 07/18/89	Control Room Emergency Ventilation System Condenser Units are cleaned at least once every 36 months.	CREVS Condenser Units are inspected and cleaned (if required) at least once every 18 months.	The change to the frequency is a precautionary measure to ensure early detection/elimination of a potential bio-fouling condition. Although bio-fouling has not been historically found in the CREVS system, the frequency should be increased as a precautionary measure to ensure early detection/elimination.
O15555 GL 89-013 (Log 2997) 07/18/1989	Test the Decay Heat Cooler performance every 5 years.	Remove testing of the Decay Heat Coolers from the GL 89-013 Program.	The CCW system does not obtain make up from the SW system and chemistry controls are routinely well maintained. Heat transfer testing and visual inspections of CCW heat exchangers in the last 10 years have not identified any conditions of degraded heat transfer.

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O15555 GL 89-013 (Log 2997) 07/18/1989	Conduct CCW Heat Exchanger performance testing once per year for the GL 89-013 program.	CCW Heat Exchanger testing now done one each year: each heat exchanger is tested once every 3 years.	Follow up inspections have not identified any fouling in recent years. The reason for not meeting previous tests was found to be poor test design which has been improved.
O15921 Serial 1836 09/18/1990	Monitor MU Pump performance to ensure that feed and bleed capability is maintained by requiring action at an alert level when the MU Pump appears to be degrading.	The alert level at which action was required has been deleted. The surveillance procedure contains a set value at which action is required.	A calculation provided the appropriate value to be used in the surveillance test.
O16667 LER 92-003 4/22/1992	Procedures include preoperational checks of surveillance requirements for their associated IST valves.	The commitment now only applies to two valves SW 1424 and SW 1429.	The Third Ten-year Interval IST Program has on-line testing requirements for SW 1424 and SW 1429. The other valves previously in the commitment are tested only when the plant is shutdown per the Third Ten-Year Interval IST Program.



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O17419 IR 93-016 (Log 1-2963) 12/29/1993	Valves SW232, SW233, SW236 and SW234 (SW to CCW cross-connect valves) are exercised once each cycle to ensure valve reliability.	Commitment closed.	The function of these valves has been reviewed and reclassified and now are considered to fall under the ASME Code requirements. The ASME Code requires these valves be part of the IST Program and, therefore, are included in the current Second Interval IST Program.
O17955 IR 94-017-02 (Log 1-3550) 02/13/1995	Annual PM activities perform electronic characteristic and diagnostic (ECAD) testing on cables known to be in a wet environment.	PM frequency changed from annual to every two years.	After five years of monitoring with no evidence of water intrusion the PM periodicity has been re-assessed. The original interval was a conservative frequency.
O18252 Amendment 206 (Log 4795) 02/26/1996	Breakers required to connect the SBODG to the essential bus associated with the EDG removed from service will be verified to be in the position required for the existing operational mode and plant conditions, with close and trip fuses installed through a breaker line-up check.	Breakers will be verified to be in the position required for the existing operational mode and plant conditions, with close and trip fuses installed by a visual verification that the fuse block is closed without any clearance tags.	The fuse blocks were changed out to due to the wear and unavailability of the old fuse blocks. The new fuse blocks do not allow direct sight of the installed fuse.

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O18574 LER 96-007 11/14/1996	Maintain Control Room Pressure Boundary openings less than 3 square inches to ensure no unattended openings exist between the CREVS fan and the filter housing.	Maximum permissible opening for the Control Room positive Pressure Boundary is 7.5 square inches.	Revised Calculation determined the maximum permissible opening for the Control Room Pressure Boundary to be 7.5 square inches with the Control Room Equipment Fan running.
O18789 LER 97-010 06/03/1997	The Start-up Transformers 01 & 02 Deluge Tests periodically check the temperature sensors to ensure the setpoint of the sensors has not drifted outside acceptable values. This eliminates spurious transformer fire protection deluge system actuations.	Commitment closed.	A modification installed a "permissive interlock" which requires the start-up transformer to be de-energized before the deluge system will initiate. Additionally, the detector actuation is an "alarm only" function and a low setpoint will no longer result in an automatic actuation of the deluge system, eliminating the potential for a spurious deluge actuation.

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O04851 GL 85-002, Serial 1161 4/17/1985	Administrative controls preclude the introduction of foreign objects into the Steam Generators during maintenance. Accountability of tools and equipment is maintained by entry and exit logs. All tools used are attached to lanyards.	Lanyards are no longer required to for tools used within the Steam Generators.	The use of lanyards was an over-commitment in response to the Generic Letter requirements, and is not practical in all cases. Tool accountability is still maintained through the use of entry and exit logs.
O05641 GL 87-012, Serial 1423 7/9/1987	Polyethylene filtered bottles are used to vent the RCS to containment to trap moisture and contaminants.	The use of polyethylene filter bottles is optional when venting the RCS.	It is not the best practice for maintaining dose As Low As Reasonable Achievable (ALARA) to require polyethylene filter bottles at all vent points at all times.
O13548/O13563 Bulletin 82-002, IR 84-028-07 1/18/1985	Maintain maintenance procedure to inspect threaded fasteners during disassembly, inspection, repair and re-assembly of the Reactor Coolant Pump. Fasteners are inspected visually and by utilizing magnetic particle non-destructive examination methods.	Deleted requirement to inspect threaded fasteners via magnetic particle non-destructive examination methods. Procedure still performs visual inspection of fasteners.	Bulletin 82-002 did not require the use of non-destructive examination methods (such as magnetic particle examination) to inspect threaded fasteners.

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O13804 LER 88-028 1/16/1989	Maintain maintenance procedure to ensure proper setup of the positioner and travel stop for the Turbine Bypass Valves.	Commitment closed.	The Turbine Bypass Valves for which this commitment applied were replaced with a completely different style valve and actuator.
O14530 IR 87-025, Log 1-1678 10/1/1987	Maintain calibration procedure to clearly establish the testing connections, provide for tighter alignment criteria, and verify mechanical and electrical limits of the Turbine Bypass Valves.	Commitment closed.	The Turbine Bypass Valves for which this commitment applied were replaced with a completely different style valve and actuator.

List of Abbreviations Used

ASME	American Society of Mechanical Engineers
CAC	Containment Air Cooler
CCW	Component Cooling Water
CREVS	Control Room Emergency Ventilation System
DBNPS	Davis-Besse Nuclear Power Station
EDG	Emergency Diesel Generator
EVS	Emergency Ventilation System
GL	Nuclear Regulatory Commission Generic Letter
IR	Nuclear Regulatory Commission Inspection Report
IST	Inservice Testing
LER	Licensee Event Report
MU	Make-Up
NRC	Nuclear Regulatory Commission
PM	Preventive Maintenance
PORV	Pressurizer Operated Relief Valves
PZR	Pressurizer
RCS	Reactor Coolant System
SBODG	Station Blackout Diesel Generator
SERIAL	Letter from Davis-Besse Nuclear Power Station to Nuclear Regulatory Commission
SW	Service Water
USAR	Updated Safety Analysis Report