

December 23, 2002

MEMORANDUM TO: Jon B. Hopkins, Senior Project Manager, Section III-2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Brendan T. Moroney, Project Manager
Project Directorate II-2 **/RA/**
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: DAVIS-BESSE - REQUEST FOR ADDITIONAL INFORMATION ON
SAFETY FEATURES ACTUATION SIGNAL (SFAS)/STEAM AND
FEEDWATER RUPTURE CONTROL SYSTEM (SFRCS)
AMENDMENT REQUEST (TAC MB1679)

I recently coordinated two conference calls with Davis-Besse plant personnel to discuss potential Requests for Additional Information (RAIs) on the subject license amendment request.

On December 11, 2002, we discussed 5 potential RAI questions (see attached list). A copy of the questions had been faxed previously to Davis-Besse to facilitate the discussion. Nuclear Reactor Regulation participants, in addition to myself, were Carl Schulten, Hukam Garg and Mahesh Chawla. Davis-Besse was represented by Dale Wuoko, Mark Reimer, Al Weiss and Bob Wharry. Based on the discussion, it was determined that no RAI was needed for Questions 1, 2, 3 and 5, since they were adequately addressed in the licensee's submittal. For Question 4, the licensee agreed to revise the proposed wording in the license amendment request to clarify the difference between functional units and instrument channels. They will issue a supplement to their submittal.

On December 12, 2002, Carl Schulten and I had a follow-up conference call with Dale Wuoko, Mark Reimer and Mark Leisure. Carl informed them that additional justification based on the change in risk analysis was needed for extending the time allowed to complete surveillances on the SFRCS channels. This system is unique to Davis-Besse and, unlike SFAS, is not addressed in the Standard Technical Specifications for Babcock & Wilcox nuclear plants. They agreed to provide the additional information in the supplemental submittal.

On December 17, 2002, Dale Wuoko informed me that due to availability of probabilistic risk assessment technical resources and the schedule of the offsite review group, they will not be issuing the supplement until the first week in March 2003.

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SFAS and SFRCS Changes to Technical Specification (TS) Bypass Testing

SFAS surveillance requirement (SR) 4.3.2.1 and SFRCS SR 4.3.2.2.2 require the logic for the bypasses to be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of functional units (channels) affected by the bypass operation and the total bypass function shall be demonstrated OPERABLE during the Refueling Interval CHANNEL CALIBRATION of each functional unit (channel) affected by the bypass operation.

1. SFAS, SR 4.3.2.1.2 Changes - The LAR states that SFAS instrumentation include channel bypasses, operating bypasses, and shutdown bypasses. Which functional units have shutdown bypasses as part of their design? Since channel bypasses and shutdown bypasses are not required to be tested by TS, but are part of the system logic could failure of these bypasses affect SFAS operability?
2. SFAS, SR 4.3.2.1.2 Changes - Proposed changes replace the current TS requirements to test “logic bypasses” and “total bypass function” with “RCS pressure operating” bypasses in order to clarify the term “total bypass function” in SR 4.3.2.1.2. The LAR discussion notes that the RCS pressure operating bypass is the only SFAS bypass referred to in TS Table 3.3-3 (Table Notation “*” and “**”). Are there other operating bypasses in addition to the RCS pressure operating bypasses?
3. SFRCS, SR 4.3.2.2.2 Changes - The LAR states that SFRCS instrumentation include both a channel bypass and a shutdown bypass. Proposed changes to Davis-Besse Nuclear Power Station replace the current TS requirements to test the “logic bypasses” and “total bypass function” with “shutdown bypasses” in order to clarify the term “total bypass function” for SFRCS in SR 4.3.2.2.2. The LAR notes the RCS pressure operating bypass is the only SFAS bypass referred to in TS Table 3.3-11 (Table Notation “*”). Since channel bypasses and shutdown bypasses are not required to be tested by TS, but are part of the system logic could failure of these bypasses affect SFRCS operability?

SFAS Changes

Current TS require 4 functional units to be operable and Action Statement requirements are provided for the number of operable units one less than the total number of units and startup and/or power operations may proceed provided inoperable functional units are tripped within one hour. Additionally, the minimum units operable requirement must be met; however, Table 3.3-3, Action 10.b also states that one additional functional unit may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1-1.

4. Table 3.3-3 Changes - The current TS does not use channels designations in Table 3.3-3. Revise Action 10 to be consistent with the nomenclature in Table 3.3-3.
5. Table 3.3-3 Changes - The 8-hour proposed allowed outage time for performing a channel functional test requires at least two other channels to be operable, however, the current Table 3.3-3, Action 10 for an inoperable channel requires 3 out of 4 functional units to be operable. These CTS changes are not evaluated in the LAR. Provide a safety basis analysis for the proposed changes.