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Docket Number 50-346

License Number NPF-3

Serial Number 2828

February 19, 2003

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555-0001Subject: Supplemental Information for Technical Specification Change regarding Missed  
Surveillances (License Amendment Request 01-0017)

Ladies and Gentlemen:

By letter dated June 4, 2002 (Serial Number 2767), the FirstEnergy Nuclear Operating Company (FENOC) submitted an application for amendment of the Operating License, Appendix A, Technical Specifications (TS) for the Davis-Besse Nuclear Power Station (DBNPS). The proposed amendment would modify TS requirements for missed surveillances in Specification 4.0.3.

During telephone discussions held between members of the NRC staff and the DBNPS staff on December 3, 2002, and December 9, 2002, the NRC staff requested an additional change to the proposed TS Bases in order to support approval of the amendment application. The additional change to the TS Bases is shown in Enclosure 2 and will be completed in accordance with the TS 6.17, Technical Specifications (TS) Bases Control Program, no later than concurrently with the implementation of the requested amendment. The marked-up TS Bases page in Enclosure 2 includes the proposed changes that were included in the June 4, 2002, letter with the additional revision committed to above highlighted.

This supplemental information provided in support of the requested license amendment application has no effect on the conclusions of the safety and environmental assessments or on the proposed no significant hazards consideration determination in the original application.

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Should you have any questions or require additional information, please contact  
Mr. Patrick J. McCloskey, Manager - Regulatory Affairs, at (419) 321-8450.

Very truly yours,



MAR/s

Enclosures

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

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Enclosure 1

SUPPLEMENTAL INFORMATION TO  
APPLICATION FOR AMENDMENT  
TO FACILITY OPERATING LICENSE NPF-3  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NUMBER 1

This letter contains supplemental information to License Amendment Request 01-0017 that requests changes to the Davis-Besse Nuclear Power Station Unit Number 1, Facility Operating License Number NPF-3.

I declare under penalty of perjury that I am authorized by the FirstEnergy Nuclear Operating Company to make this request and the foregoing is true and correct.

Executed on: February 19, 2003

By:   
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Lew W. Myers, Chief Operating Officer - FENOC

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Enclosure 2

MARK-UP OF TECHNICAL SPECIFICATION BASES PAGE  
(One page follows)

## APPLICABILITY

### BASES

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4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The allowable tolerance for performing surveillance activities is sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval. It is not intended that the allowable tolerance be used as a convenience to repeatedly schedule the performance of surveillances at the allowable tolerance limit.

The allowable tolerance for performing surveillance activities also provides flexibility to accommodate the length of a fuel cycle for surveillances that are specified to be performed at least once each REFUELING INTERVAL. It is the intent that REFUELING INTERVAL surveillances be performed in an OPERATIONAL MODE consistent with safe plant operation.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when either they are found or known to be inoperable although still meeting the Surveillance Requirements, or the requirements of the surveillance(s) are known to be not met between required surveillance performances.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with required ACTIONS or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the

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Enclosure 3

### COMMITMENT LIST

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER – REGULATORY AFFAIRS (419-321-8450) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

#### COMMITMENTS

The additional change to the TS Bases is shown in Enclosure 2 and will be completed in accordance with the TS 6.17, TS Bases Control Program.

#### DUE DATE

Prior to or concurrent with implementation of the requested amendment.