

Lew W. Myers  
Chief Operating Officer

419-321-7599  
Fax: 419-321-7582

Docket Number 50-346

License Number NPF-3

Serial Number 2838

May 6, 2003

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555-0001

Subject: Supplemental Information for License Amendment Application to Revise  
Technical Specifications 3/4.3.1, Reactor Protection System Instrumentation;  
3/4.3.2.1, Safety Features Actuation System Instrumentation; 3/4.3.2.2, Steam  
and Feedwater Rupture Control System Instrumentation, and Associated Bases  
(License Amendment Request 99-0004, TAC No. MB1679)

Ladies and Gentlemen:

By letter dated April 1, 2001 (Serial Number 2625), 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 revise Technical Specification (TS) Table 3.3-3, Safety Features Actuation System (SFAS) Instrumentation, TS Table 3.3-11, Steam and Feedwater Rupture Control System (SFRCS) Instrumentation, and associated Bases to add a provision to allow an eight-hour delay in entering an Action statement when an SFAS or SFRCS instrumentation channel is undergoing Channel Functional Testing. Additionally, Surveillance Requirements 4.3.1.1.2, 4.3.2.1.2, and 4.3.2.2.2 would be revised to clarify the term "total bypass function."

During a telephone discussion held between members of the NRC staff and the DBNPS staff on December 12, 2002, the NRC staff requested a quantitative assessment of risk assuming the entire 8-hour allowance was used for each SFRCS channel functional test. The SFRCS, unlike the SFAS with an eight-hour Action statement delay allowance, was not specifically addressed in NUREG-1430, *Standard Technical Specifications - Babcock and Wilcox Plants*, Revision 2.

A001

Docket Number 50-346  
License Number NPF-3  
Serial Number 2838  
Page 2

In response to this request, FENOC performed a quantitative evaluation of risk. This evaluation assumed that each time an SFRCS channel undergoes a channel functional test that the channel is unavailable for nine hours (8-hour allowance plus one hour Action completion time; Action 16 for Table 3.3-11). The testing frequency assumed was monthly plus an annual channel calibration. The results of this evaluation show an increase in the baseline average maintenance Core Damage Frequency (CDF) of  $6.0\text{E-}08/\text{year}$ . The Davis-Besse baseline CDF is  $1.22\text{E-}5/\text{year}$ . Based on the guidance of Regulatory Guide 1.174, *An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis*, this increase in risk is considered very small.

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.

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  
D. J. Shipley, Executive Director, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)  
C. S. Thomas, NRC Region III, DB-1 Senior Resident Inspector  
Utility Radiological Safety Board

Docket Number 50-346  
License Number NPF-3  
Serial Number 2838  
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 99-0004 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: 5/6/03

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

Docket Number 50-346  
License Number NPF-3  
Serial Number 2838  
Enclosure 2

**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**

**DUE DATE**

None

N/A