

October 28, 2003

Mr. Lew W. Myers
Chief Operating Officer
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - REQUEST FOR
ADDITIONAL INFORMATION RELATED TO LICENSE AMENDMENT REQUEST
(TAC NO. MC0366)

Dear Mr. Myers:

By application dated August 11, 2003, FirstEnergy Nuclear Operating Company requested a license amendment to relocate Surveillance Requirement (SR) 4.5.2.f from the technical specifications to the Technical Requirements Manual. SR 4.5.2.f requires periodic performance of a vacuum leakage rate test of the watertight enclosure for valves DH-11 and DH-12. Based on the staff's review of your application, please provide additional information as discussed in the enclosure to this letter.

The enclosed request was discussed with Mr. D. Wuokko of your staff on October 8, 2003. A mutually agreeable target date of January 4, 2004, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request for Additional Information

cc w/encl: See next page

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*Memo dated 9/29/03

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DATE	10/23/03	10/22/03	9/29/03	10/28/03

OFFICIAL RECORD COPY

Davis-Besse Nuclear Power Station, Unit 1

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The Honorable Dennis J. Kucinich, Member
United States House of Representatives
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Lakewood, OH 44107

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT REQUEST DATED AUGUST 11, 2003

FIRSTENERGY NUCLEAR OPERATING COMPANY

DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1

DOCKET NO. 50-346

1. The proposed technical specification (TS) change would relocate Surveillance Requirement (SR) 4.5.2.f to the updated safety analysis report (USAR) Technical Requirements Manual (TRM). However, the submittal does not address the requirement of 10 CFR 50.36(c)(3) to provide a reason why it is acceptable to remove this SR from the TSs. SRs are in place to verify and/or demonstrate that the associated limiting conditions for operation (LCO) are being met. Please provide the basis for why the SR is not required to demonstrate that the associated LCO is being met.
2. TS LCO 3.5.2 requires two independent emergency core cooling system (ECCS) subsystems to be operable. SR 4.5.2.f requires each ECCS subsystem to be demonstrated operable by performing a vacuum leakage rate test on the watertight enclosure for decay heat removal system valves DH-11 and DH-12, to assure that the motor operators on the valves will not be flooded for at least 7 days following a loss-of-coolant accident (LOCA). The relocation of SR 4.5.2.f to USAR TRM will relax the immediate action required by the TS. Please explain any compensatory measures that will be implemented if this SR is moved to the USAR TRM.
3. If SR 4.5.2.f is relocated to the USAR TRM, explain (1) what changes (if any) will be made to the vacuum leakage rate test requirements on the watertight enclosure, (2) what criteria are used to determine test acceptability, and (3) what assurance is provided that the electric motor operators on the valves will not be flooded following a LOCA.
4. As stated in the submittal, the Bases associated with TS 3/4.5.2 will also be relocated to the USAR TRM. However, the provisions of the TS Bases Control program will no longer apply to the relocated Bases. Please describe the administrative controls program for the USAR TRM.
5. SR 4.5.2.f requires the watertight enclosure to be tested once per 18 months. The plant is currently operating on a 24-month fuel cycle. As stated in the submittal, the 18-month test frequency was added due to the design of the watertight enclosure, and was based upon performing testing at a refueling outage frequency rather than a fixed absolute time-span. To avoid the need for performing the surveillance during mid-cycle outages, have you considered whether a change to the valve test interval to a 24-month frequency can be justified with a TS amendment, rather than making future changes to the relocated specification under 10 CFR 50.59?
6. The plant has two active means of boron precipitation control (BPC) that ensure the chemical additive concentration remains below its solubility limit throughout the post-accident cooling period. As stated in the submittal, the backup BPC method utilizes one of the two operating DH/LPI pumps taking suction from the DH "drop line" via valves DH-11 and DH-12, and discharges a throttled flow rate into the reactor vessel via the core flood nozzles. The submittal states that a plant modification is planned during the ongoing

thirteenth refueling outage to add a new cross-tie line and associated valving that allow the discharge of either DH/LPI pump to backflow through the DH-11 and DH-12 drop line and into the reactor vessel. The new primary BPC method would still utilize a flow path through valves DH-11 and DH-12. Therefore, the watertight enclosure is always important to ensure that the valves will remain capable of opening following a LOCA. SR 4.5.2.f provides assurance that at least one BPC method will be available post-LOCA. Please explain the safety basis for the two valves, including their purposes for boron control and for decay heat removal.