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Fax: 419-321-7582Docket Number 50-346
License Number NPF-3
Serial Number 1-1372

June 30, 2004

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555-0001Subject: Correction of Information Provided Regarding Response to Generic
Letter 88-14

Ladies and Gentlemen:

During an Extent of Condition (EOC) review of prior NRC submittals for completeness and accuracy, minor inaccuracies were identified with information provided for the Davis-Besse Nuclear Power Station (DBNPS) in Toledo Edison (TE) letter Serial Number 1-861, "Toledo Edison's Response to Generic Letter Number 88-14," dated February 22, 1989. Corrections to this letter are specified below (double underline indicates new inserted text; strikethrough indicates deleted previous text):

- The response to Item 3 on page 1 of the Attachment should be modified as shown below:

Each air-operated safety related valve was verified to fail (on a loss of instrument air) to its required safety position during the System Review and Test Program (SRTP) conducted in 1986-1987. Additionally, safety related accumulators were verified to be sized correctly and to perform as required during a loss of instrument air and other design-basis events.

Corrective Actions completed during the 13th Refueling Outage make the last sentence of this response correct as written. However, based upon issues discovered, the last sentence in the response to Item 3 in Generic Letter 88-14 was not accurate at the time of initiation. Licensee Event Report (LER) 2003-001 (Revision 2), "Potential Inability of Air-Operated Valves to Function During Design Basis Conditions," documented that upon a loss of non-safety instrument air, certain valves would not have been capable of performing their intended safety functions because they were not provided with sufficiently sized accumulators. The LER (2003-001 Revision 2) also documented that Corrective Actions have been taken to restore the components to their design

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requirements. These modifications included either installation of properly sized safety-related air accumulators, installation of properly sized safety-related high pressure nitrogen bottles, or installation of a new valve actuator and an additional safety-related air accumulator. Therefore, although the last sentence in the response to Item 3 in Generic Letter 88-14 was not accurate at the time in which it was made, due to the restoration of the components to their design requirements, no change was made to the response for Generic Letter 88-14.

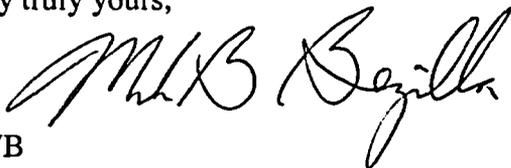
- The first paragraph to the response of Item 4 on page 2 of the Attachment should be modified as shown below:

Air quality of Davis-Besse's Instrument Air System is maintained as part of scheduled Preventive Maintenance. The system's dewpoint is checked ~~three times weekly~~periodically. Particle size and oil content are maintained through the use of an air dryer after-filter. The differential pressure across this filter is checked daily and the elements are inspected ~~quarterly~~semi-annually, and replaced if necessary.

FENOC does not believe that the minor inaccuracies being corrected by this letter constitute information that is inaccurate or incomplete in any material respect. The corrections specified above address statements of fact that may have been incomplete or inaccurate at the time of the original submittal. No attempt has been made to update the contents of letter Serial Number 1-861 with currently available information regarding Instrument Air supply system problems affecting Safety-Related equipment. Licensee Event Report 2003-001 documents the potential inability of air-operated valves to function during some design basis conditions and the actions that the DBNPS committed to as a result of the discovery.

Should you have any questions or require additional information, please contact Mr. Gregory A. Dunn, Manager – Regulatory Affairs, at (419) 321-8450.

Very truly yours,



AWB

Attachment

cc: Regional Administrator, NRC Region III
DB-1 NRC/NRR Senior Project Manager
DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Manager – Regulatory Affairs (419-321-8450) at Davis-Besse of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

None

N/A