FENOC
FirstEnergy Nuclear Operating Company

5501 North State Route 2
Oak Harbor, Ohio 43449

Mark B. Bezilla
Vice President - Nuclear

419-321-7676
Fax: 419-321-7582

Docket Number 50-346

10 CFR 50.90

License Number NPF-3

Serial Number 3070

July 19, 2004

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

Subject: Supplemental Information Regarding License Amendment Application to Modify Technical Specification 3/4.5.2, Emergency Core Cooling Systems - ECCS Subsystems - $T_{avg} \geq 280$ °F
(License Amendment Request No. 03-0004; TAC No. MC0366)

Ladies and Gentlemen:

On August 11, 2003, the FirstEnergy Nuclear Operating Company (FENOC) submitted an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License Number NPF-3, Appendix A Technical Specifications, regarding a proposed modification to Technical Specification (TS) 3/4.5.2, "Emergency Core Cooling Systems - ECCS Subsystems - $T_{avg} \geq 280$ °F." This TS Section includes Surveillance Requirement (SR) 4.5.2.f, which requires each ECCS Subsystem to be demonstrated operable by performing a vacuum leakage rate test of the watertight enclosure for Decay Heat Removal System valves DH-11 and DH-12 that assures the electric motor operators on valves DH-11 and DH-12 will not be flooded for at least seven (7) days following a Loss-of-Coolant Accident (LOCA). The proposed amendment (DBNPS letter Serial Number 2834) would allow the relocation of SR 4.5.2.f to the DBNPS Updated Safety Analysis Report (USAR) Technical Requirements Manual (TRM). Supplemental information regarding the proposed amendment was submitted by letter dated January 9, 2004 (DBNPS Serial Number 2996).

By letter dated June 2, 2004, FENOC received a request for additional information (DBNPS letter Log Number 6200) regarding the license amendment application. Enclosure 1 provides the response to this request. FENOC believes that this supplemental information does not affect the conclusion of the license amendment application that the proposed changes do not involve a significant hazards consideration and do not have an adverse effect on nuclear safety.

A001

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

The statements contained in this submittal, including its associated enclosures, are true and correct to the best of my knowledge and belief. I am authorized by the FirstEnergy Nuclear Operating Company to make this submittal. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 19, 2004

MKL

Enclosures

cc: 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

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

REGARDING

LICENSE AMENDMENT REQUEST (LAR) 03-0004

FOR

DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

Question:

Associated with the proposed surveillance requirement is a change reducing the surveillance frequency. Provide additional information regarding the assessment of the change in risk of the proposed surveillance frequency change.

DBNPS Response:

The risk associated with a revised surveillance frequency interval from 18-months to 24-months was calculated in Davis-Besse Nuclear Power Station calculation C-NSA-099.16-26, Revision 4. This calculation determined a failure rate for the watertight enclosure using data from as-found leak tests. The available data is from tests performed prior to the modifications made to the watertight enclosure prior during the Thirteenth Refueling Outage. (Note: These modifications are described on pages 3 and 4 of Enclosure 1 of the August 11, 2003 license amendment application.) However, it is expected that the improvements made to the enclosure will improve its reliability. Therefore, the results of the calculation are expected to be conservative. Additionally, calculations were performed to determine the sensitivity of risk to the enclosure failure rate. The results of this analysis determined that the increase in core damage frequency (CDF) associated with the increase in surveillance frequency is less than 1E-8 per year. The results were less than 1E-8 per year even when the failure rate of the enclosure was increased by a factor of two.

Large Early Release Frequency (LERF) was not specifically calculated for the increase in surveillance test frequency. However, as discussed in calculation C-NSA-099.16-26, the LERF contribution for any boron precipitation control sequence was determined to be very small. The very small LERF contribution is to be expected because the reactor coolant system is depressurized and, at a minimum, the borated water storage tank would be injected.

Docket Number 50-346
License Number NPF-3
Serial Number 3070
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