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Docket Number 50-346

10CFR50.90

License Number NPF-3

Serial Number 3044

July 29, 2004

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Subject: Davis-Besse Nuclear Power Station
Application for Technical Specification Change Regarding Combustible Gas
Control Systems (License Amendment Request No. 03-0021)

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, the FirstEnergy Nuclear Operating Company (FENOC) is submitting a request for an amendment to the Technical Specifications (TS) for the Davis-Besse Nuclear Power Station (DBNPS), Unit 1.

The proposed amendment would delete the TS requirements related to the combustible gas control systems. The following TSs are affected: TS 3/4.6.4.1, "Hydrogen Analyzers"; TS 3/4.6.4.3, "Containment Hydrogen Dilution System"; TS 3/4.6.4.4, "Hydrogen Purge System"; and TS 6.8.4.f, "Ventilation Filter Testing Program (VFTP)". FENOC will maintain a hydrogen monitoring system capable of diagnosing beyond design-basis accidents, and will relocate requirements regarding the hydrogen analyzers to the DBNPS Updated Safety Analysis Report (USAR) Technical Requirements Manual, following NRC approval of this license amendment and concurrent with its implementation.

The proposed amendment is based on the changes to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The 10 CFR 50.44 rule changes eliminated the requirements for hydrogen recombiners and hydrogen purge systems, and relaxed the requirements for hydrogen and oxygen monitoring equipment to make them commensurate with their risk significance. The final rule publication (68 FR 54123 dated September 16, 2003) recognized that some plants have

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hydrogen vent and purge systems that backup the hydrogen recombiners, and that these backup systems were also no longer required. At the DBNPS, the hydrogen analyzers, Containment Hydrogen Dilution System, and Hydrogen Purge System presently provide the combustible gas control function and have requirements in the Operating License TSs. The elimination of the TS requirements relative to the hydrogen analyzers, Containment Hydrogen Dilution System, and Hydrogen Purge System is consistent with the intent of the final rule.

The proposed changes are also consistent with the intent of Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 (68 FR 55416), as part of the Consolidated Line Item Improvement Process (CLIP). As with the 10 CFR 50.44 final rule publication, the model Safety Evaluation included with the CLIP recognized that the reasoning for the elimination of the need for the hydrogen recombiners also applied to hydrogen vent and purge systems.

In order for the DBNPS to accrue the benefits afforded by the rule change in a timely manner, approval of the proposed amendment is requested by August 1, 2005. Once approved, the amendment shall be implemented within 120 days.

The proposed changes have been reviewed by the DBNPS onsite and offsite review committees.

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 and attachments, 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 7/29/2004



MKL

Enclosures

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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

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Enclosure 1

**DAVIS-BESSE NUCLEAR POWER STATION
DESCRIPTION AND ASSESSMENT
FOR
LICENSE AMENDMENT REQUEST NUMBER 03-0021**

(23 pages follow)

**DAVIS-BESSE NUCLEAR POWER STATION
DESCRIPTION AND ASSESSMENT
FOR
LICENSE AMENDMENT REQUEST NUMBER 03-0021**

Subject: Application for Technical Specification Change Regarding Combustible Gas Control Systems.

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1.0 INTRODUCTION

The proposed amendment is based on the changes to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The 10 CFR 50.44 rule changes eliminated the requirements for hydrogen recombiners and hydrogen purge systems, and relaxed the requirements for hydrogen and oxygen monitoring equipment to make them commensurate with their risk significance. The final rule publication (68 FR 54123 dated September 16, 2003) recognized that some plants have hydrogen vent and purge systems that backup the hydrogen recombiners, and that these backup systems were also no longer required. At the Davis-Besse Nuclear Power Station, Unit Number 1 (DBNPS), the hydrogen analyzers, Containment Hydrogen Dilution System, and Hydrogen Purge System presently provide the combustible gas control function and have requirements in the Operating License Technical Specifications (TSs). The elimination of the TS requirements relative to the hydrogen analyzers, Containment Hydrogen Dilution System, and Hydrogen Purge System is consistent with the intent of the final rule.

The proposed changes are also consistent with the intent of Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 (68 FR 55416), as part of the Consolidated Line Item Improvement Process (CLIIP). As with the 10 CFR 50.44 final rule publication, the model Safety Evaluation included with the CLIIP recognized that the reasoning for the elimination of the need for the hydrogen recombiners also applied to hydrogen vent and purge systems.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

The proposed amendment would delete the TS requirements related to the combustible gas control systems. TS 3/4.6.4.1, "Hydrogen Analyzers", TS 3/4.6.4.3, "Containment Hydrogen Dilution System", and TS 3/4.6.4.4, "Hydrogen Purge System", would be deleted in their entirety. In addition, TS 6.8.4.f, "Ventilation Filter Testing Program (VFTP)", would be revised to remove requirements related to the Hydrogen Purge System. Related to these changes, administrative changes to pages VI and XI of the TS Index are also proposed.

3.0 BACKGROUND

The background for this application is addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416),

TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

5.0 TECHNICAL ANALYSIS

FENOC has reviewed the Nuclear Regulatory Commission (NRC) staff's safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. FENOC has concluded that the information presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to the DBNPS and support this amendment for the incorporation of the changes to the DBNPS TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

6.1 Verification and Commitments

As discussed in the NRC staff's model SE published in the Federal Register on September 25, 2003 (68 FR 55416) for this TS improvement, FENOC is making the following verifications and regulatory commitments:

1. FENOC has verified, as discussed below, that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at the DBNPS and is making a regulatory commitment to maintain that capability.

The hydrogen monitoring system installed at the DBNPS is safety grade and has a measurement capability of hydrogen concentration over a range of 0 to 10%. This range was previously approved by the NRC as acceptable, and remains sufficient to support this license amendment application.

In the event the hydrogen monitoring system was not available, hydrogen concentration can be determined via the post-accident sampling system (PASS). It is noted that FENOC is pursuing a separate licensing amendment application that would allow elimination of the PASS. However, this license amendment application would require FENOC to develop contingency plans for obtaining and analyzing highly radioactive samples from the containment atmosphere. Hence, the capability to analyze containment atmosphere samples for hydrogen concentration would be maintained.

Draft Regulatory Guide DG-1117, "Control of Combustible Gas Concentrations in Containment," describes methods acceptable to the NRC staff for implementing the 10 CFR 50.44 rule change. As stated in Section C.2.1 of DG-1117, safety-related hydrogen monitoring systems installed and approved by the NRC prior to the effective date of the rule are sufficient to meet the criteria that equipment for monitoring hydrogen must be functional, reliable, and capable of continuously measuring the concentration of hydrogen in the containment atmosphere following a design-basis accident for accident management, including emergency planning.

The DBNPS sample pumps utilized in the hydrogen monitoring system, due to pressure limitations, are not capable of being placed into service until several hours following an accident. Attachment 6 to Item II.F.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," requires that the hydrogen monitors be capable of operating within 30 minutes of initiation of safety injection. Section C.2.1 of DG-1117 notes that the 30 minute requirement can be overly burdensome and describes a method for licensees to adopt a risk-informed functional requirement in lieu of the 30 minute requirement. Final resolution of this variance is being addressed under the DBNPS corrective action process.

The requirements for maintaining a hydrogen monitoring system capable of diagnosing beyond design-basis accidents as described above will be included in the DBNPS USAR Technical Requirements Manual. This regulatory commitment will be implemented concurrent with the proposed amendment implementation.

2. The DBNPS does not have an inerted containment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

FENOC has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIP. FENOC has concluded that the proposed determination presented in the notice is applicable to the DBNPS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

FENOC has reviewed the environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIP. FENOC has concluded that the staff's findings presented in that evaluation are applicable to the DBNPS and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. FENOC is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416) other than those differences related to the use of hydrogen vent and purge systems in lieu of installed hydrogen recombiners, and other than format differences between the DBNPS TS and the Improved Standard Technical Specifications for Babcock and Wilcox Plants. A license amendment in accordance with the CLIIP was issued by the NRC for the Beaver Valley Power Station on May 19, 2004 (Reference 6).

10.0 REFERENCES

1. DBNPS Operating License NPF-3, Appendix A Technical Specifications through Amendment No. 262.
2. DBNPS Updated Safety Analysis Report through Revision 23.
3. Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003 (68 FR 55416).
4. Industry/TSTF Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors".
5. Final Rule, Combustible Gas Control in Containment, published September 16, 2003 (68 FR 54123).
6. NRC letter dated May 19, 2004, "Beaver Valley Power Station, Unit Nos. 1 and 2 -Issuance of Amendments re: Elimination of Hydrogen Recombiners and Hydrogen Monitors (TAC Nos. MC1869 and MC1870)".

11.0 ATTACHMENTS

1. Proposed Mark-Up Of Technical Specification Pages
2. Proposed Retyped Technical Specification Pages

**PROPOSED MARK-UP
OF
TECHNICAL SPECIFICATION PAGES**

(8 pages follow)

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CONTAINMENT SYSTEMS

3/4.6.4 COMBUSTIBLE GAS CONTROL

HYDROGEN ANALYZERS

LIMITING CONDITION FOR OPERATION

~~3.6.4.1 Two independent containment hydrogen analyzers shall be OPERABLE.~~

APPLICABILITY: ~~MODES 1 and 2.~~

ACTION:

- a. ~~With one hydrogen analyzer inoperable, restore the inoperable analyzer to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.~~
- b. ~~With both hydrogen analyzers inoperable, restore at least one analyzer to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.~~

SURVEILLANCE REQUIREMENTS

~~4.6.4.1 Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 31 days by performance of a CHANNEL CHECK.~~

~~4.6.4.2 Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION using sample gases containing:~~

- a. ~~Zero volume percent hydrogen, balance nitrogen, and~~
- b. ~~2.5 ± 0.5 volume percent hydrogen, balance nitrogen.~~

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CONTAINMENT SYSTEMS

CONTAINMENT HYDROGEN DILUTION SYSTEM

LIMITING CONDITION FOR OPERATION

~~3.6.4.3 Two independent containment hydrogen dilution systems shall be OPERABLE.~~

APPLICABILITY: MODES 1 and 2.

ACTION:

- ~~a. With one containment hydrogen dilution system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.~~
- ~~b. With both containment hydrogen dilution systems inoperable, restore at least one dilution system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.~~

SURVEILLANCE REQUIREMENTS

~~4.6.4.3 Each containment hydrogen dilution system shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST basis by:~~

- ~~a. Verifying that the system can be started on operator action in the control room, and~~
- ~~b. Verifying that the system operates for at least 15 minutes and the blower develops a discharge pressure of 15 psig.~~

DELETED

CONTAINMENT SYSTEMS

HYDROGEN PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

~~3.6.4.4 A containment hydrogen-purge system shall be OPERABLE.~~

~~APPLICABILITY: MODES 1 and 2.~~

ACTION:

~~With the containment hydrogen-purge system inoperable, restore the hydrogen-purge system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.~~

SURVEILLANCE REQUIREMENTS

~~4.6.4.4 The hydrogen-purge system shall be demonstrated OPERABLE:~~

- ~~a. At least once each 18 months by initiating flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.~~
- ~~b. At least once each 18 months and in accordance with the Ventilation Filter Testing Program (VFTP).~~

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CONTAINMENT SYSTEMS

SURVEILANCE REQUIREMENTS (Continued)

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e.—[Deleted]

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ADMINISTRATIVE CONTROLS

6.8.4 (Continued)

e. Radiological Environmental Monitoring Program (Continued)

- 3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

f. Ventilation Filter Testing Program (VFTP):

A program shall be established to implement the following required testing of safety related filter ventilation systems in accordance with Regulatory Guide 1.52, Revision 2*, ANSI/ASME N510-1980, and ASTM D 3803-1989.

1. Demonstrate for each of the safety related systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1% when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/- 10%.

<u>Safety Related Ventilation System</u>	<u>Flowrate</u>
Containment Hydrogen Purge System	100 cfm
Shield Building Emergency Ventilation System	8000 cfm
Control Room Emergency Ventilation System	3300 cfm

2. Demonstrate for each of the safety related systems that an in-place test of the charcoal adsorber shows a penetration and system bypass < 1% when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/-10%.

<u>Safety Related Ventilation System</u>	<u>Flowrate</u>
Containment Hydrogen Purge System	100 cfm
Shield Building Emergency Ventilation System	8000 cfm
Control Room Emergency Ventilation System	3300 cfm

3. Demonstrate for each of the safety related systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified

* The periodic testing for the Shield Building Emergency Ventilation System and the Control Room Emergency Ventilation System are performed once each REFUELING INTERVAL. The need for testing following painting, a fire, or a chemical release in any ventilation zone communicating with the ~~Containment Hydrogen Purge System, the Shield Building Emergency Ventilation System, or the Control Room Emergency Ventilation System~~ is as specified by the VFTP. The method of testing is based on Regulatory Guide 1.52, Revision 2, except for charcoal laboratory testing which will be performed in accordance with ASTM D 3803-1989.

ADMINISTRATIVE CONTROLS

6.8.4 (Continued)

f. Ventilation Filter Testing Program (VFTP) (Continued)

below when tested in accordance with ASTM D 3803-1989 at a temperature of 30° C and the relative humidity (RH) specified below.

<u>Safety Related Ventilation System</u>	<u>Penetration</u>	<u>RH</u>
Containment Hydrogen Purge System	≤ 2.5%	70%
Shield Building Emergency Ventilation System	≤ 2.5%	95%
Control Room Emergency Ventilation System	≤ 2.5%	70%

4. Demonstrate for each of the safety related systems that the pressure drop across the combined HEPA filters, the prefilters*, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/- 10%.

<u>Safety Related Ventilation System</u>	<u>Delta P</u>	<u>Flowrate</u>
Containment Hydrogen Purge System	25 inches Water Gauge	100 cfm
Shield Building Emergency Ventilation System	6 inches Water Gauge	8000 cfm
Control Room Emergency Ventilation System	4.4 inches Water Gauge	3300 cfm

~~* Containment Hydrogen Purge does not contain prefilters.~~

- ~~5. Demonstrate that the heaters for the safety related Containment Hydrogen Purge System dissipate 2000 watts +/- 20% when tested in accordance with ANSI/ASME N510-1980.~~

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.

**PROPOSED RETYPED
TECHNICAL SPECIFICATION PAGES**

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ADMINISTRATIVE CONTROLS

6.8.4 (Continued)

e. Radiological Environmental Monitoring Program (Continued)

- 3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

f. Ventilation Filter Testing Program (VFTP):

A program shall be established to implement the following required testing of safety related filter ventilation systems in accordance with Regulatory Guide 1.52, Revision 2*, ANSI/ASME N510-1980, and ASTM D 3803-1989.

- 1. Demonstrate for each of the safety related systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1% when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/- 10%.

<u>Safety Related Ventilation System</u>	<u>Flowrate</u>
Shield Building Emergency Ventilation System	8000 cfm
Control Room Emergency Ventilation System	3300 cfm

- 2. Demonstrate for each of the safety related systems that an in-place test of the charcoal adsorber shows a penetration and system bypass < 1% when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/-10%.

<u>Safety Related Ventilation System</u>	<u>Flowrate</u>
Shield Building Emergency Ventilation System	8000 cfm
Control Room Emergency Ventilation System	3300 cfm

- 3. Demonstrate for each of the safety related systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified

* The periodic testing for the Shield Building Emergency Ventilation System and the Control Room Emergency Ventilation System are performed once each REFUELING INTERVAL. The need for testing following painting, a fire, or a chemical release in any ventilation zone communicating with the Shield Building Emergency Ventilation System or the Control Room Emergency Ventilation System is as specified by the VFTP. The method of testing is based on Regulatory Guide 1.52, Revision 2, except for charcoal laboratory testing which will be performed in accordance with ASTM D 3803-1989.

ADMINISTRATIVE CONTROLS .

6.8.4 (Continued)

f. Ventilation Filter Testing Program (VFTP) (Continued)

below when tested in accordance with ASTM D 3803-1989 at a temperature of 30° C and the relative humidity (RH) specified below.

<u>Safety Related Ventilation System</u>	<u>Penetration</u>	<u>RH</u>
Shield Building Emergency Ventilation System	≤ 2.5%	95%
Control Room Emergency Ventilation System	≤ 2.5%	70%

4. Demonstrate for each of the safety related systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2 and ANSI/ASME N510-1980 at the system flowrate specified below, +/- 10%.

<u>Safety Related Ventilation System</u>	<u>Delta P</u>	<u>Flowrate</u>
Shield Building Emergency Ventilation System	6 inches Water Gauge	8000 cfm
Control Room Emergency Ventilation System	4.4 inches Water Gauge	3300 cfm

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.

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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
The requirements for maintaining a hydrogen monitoring system capable of diagnosing beyond design-basis accidents as described above will be included in the DBNPS USAR Technical Requirements Manual.	Concurrent with implementation of the associated license amendment.