

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Aug 18, 2004 09:01

PAPER NUMBER: LTR-04-0528 LOGGING DATE: 08/18/2004

ACTION OFFICE: EDO

To: Caldwell, Rill
Ref. G20040551

AUTHOR: Gary Leidich

AFFILIATION: OH

ADDRESSEE: Nils Diaz

SUBJECT: Response to Union of Concerned Scientists letter regarding
Emergency Preparedness Zone Sirens at the Davis Besse Nuclear Power Station

cys: EDO
DEDMRS
DEDH
DEDM
AO
DEDR
NSIR
NRR

ACTION: Appropriate

DISTRIBUTION: RF

LETTER DATE: 08/13/2004

ACKNOWLEDGED No

SPECIAL HANDLING: Made publicly available in ADAMS via SECY/EDO/DPC

NOTES:

FILE LOCATION: ADAMS

DATE DUE:

DATE SIGNED:



FirstEnergy Nuclear Operating Company

76 South Main Street
Akron, Ohio 44308

Gary R. Leidich
President and Chief Nuclear Officer

330-384-5770
Fax: 330-384-5669

Docket Number 50-346

License Number NPF-3

Serial Number 3084

August 13, 2004

Dr. Nils J. Diaz, Chairman
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Subject: Response to Union of Concerned Scientists Letter regarding Emergency Preparedness
Zone Sirens at the Davis-Besse Nuclear Power Station

Dear Chairman Diaz:

On August 9, 2004, Mr. David Lochbaum of the Union of Concerned Scientists ("UCS") submitted a letter to the Nuclear Regulatory Commission (NRC) regarding the "Warning Sirens" at the Davis-Besse Nuclear Power Station (DBNPS). This letter provides clarification regarding FirstEnergy Nuclear Operating Company's (FENOC's) decision-making process for the DBNPS siren testing. During the May 7, 2004 monthly siren test, it was determined the DBNPS Emergency Preparedness Zone (EPZ) Sirens could not be activated from the Ottawa County Sheriff Dispatcher location. This condition was corrected within minutes of discovery and a formal root cause investigation was subsequently conducted. The DBNPS Emergency Operations Facility control station maintained the ability to activate the EPZ Sirens throughout this period of time. The root cause investigation of this event determined there was insufficient detail in procedures that control siren testing and maintenance, and the affected procedures are being revised accordingly.

FENOC initially conducted a full one-minute siren sound test every Friday following the May 7, 2004 activation failure. However, prior to the May 28, 2004 siren test, Ottawa County Emergency Management Agency officials requested FENOC consider discontinuing weekly sound tests. Their concern was that frequently sounding the sirens could inappropriately condition the general public. FENOC's desire was to ensure system reliability without impacting the general public.

As part of the investigation of the May 7, 2004 event, benchmarking determined that common industry practice is a combination of silent tests and sound tests to ensure siren reliability. Plants

Docket Number 50-346

License Number NPF-3

Serial Number 3084

Page 2 of 3

performing a combination of silent tests and sound tests currently include Braidwood, Brunswick, Byron, Clinton, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, Robinson, Shearon Harris, Three Mile Island, and Vogtle. FENOC institutionalized silent tests every working day, and as a result has been able to monitor performance more frequently and respond to individual siren failures in a more timely manner. Since the inception of daily tests on June 1, 2004, three siren failures have been identified during daily testing and the sirens were repaired much sooner than would have occurred if the sirens had continued to be tested only on a monthly basis. By increasing the siren test frequency, FENOC has improved the reliability of this important equipment while aligning the DBNPS with best industry practices.

The UCS letter also discusses the differences in EPZ Siren testing frequency at the two other FENOC stations, the Perry Nuclear Power Plant (PNPP) and the Beaver Valley Power Station (BVPS). The current EPZ Siren system configurations differ among the three FENOC stations, preventing the implementation of daily siren testing at each station. However, lessons learned from the DBNPS event have been communicated to both the PNPP and the BVPS, and both stations are considering increasing the number of siren tests to improve reliability.

The UCS letter alleges that information provided to the NRC regarding the sirens was neither credible nor reliable. The NRC was notified of the May 7, 2004 event in accordance with 10CFR50.72(b)(3)(xiii) as a Loss of Emergency Preparedness Capability (Event Number 40734). Periodic updates on the progress and results of the root cause investigation of the event were also provided to the NRC, the State of Ohio, and the Federal Emergency Management Agency (FEMA). On June 30, 2004, NRC Region III Inspectors contacted the DBNPS Emergency Preparedness Supervisor and asked if FENOC had submitted the proposed testing change to FEMA. FENOC notified the Ohio Emergency Management Agency on July 20, 2004 of the change in siren test frequency, who subsequently forwarded concurrence of the change to FEMA.

The FENOC Corrective Action Program requires issues be identified and resolved in a timely manner. The test frequency of many plant components is increased when issues are found to restore confidence and improve reliability. FENOC took strong actions to align the DBNPS siren testing with best industry practices and improve the reliability of the equipment.

The UCS letter also questioned why all of the sirens installed in Ottawa County were not included in the NRC Performance Indicator. Section 7.7 of the DBNPS Emergency Plan describes the Prompt Notification System, and states there are 54 high-powered rotating sirens installed to provide an acoustic alerting signal for the residents and transients within the 10-mile radius of the DBNPS. All 54 of these sirens are reported in the NRC Performance Indicator, with 49 sirens located in Ottawa County, and five located in Lucas County.

Docket Number 50-346
License Number NPF-3
Serial Number 3084
Page 3 of 3

If there are any questions concerning this matter, please contact Mr. Gregory A. Dunn,
Manager – Regulatory Affairs at 419-321-8450.

Very truly yours,

A handwritten signature in cursive script that reads "Gary R. Lerdick".

GMW/s

Attachment

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

Docket Number 50-346
License Number NPF-3
Serial Number 3084
Attachment, Page 1 of 1

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

None

DUE DATE

N/A