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Docket Number 50-346

10CFR50.90

License Number NPF-3

Serial Number 2958

April 20, 2005

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Subject: License Amendment Application to Revise Administrative Controls
(License Amendment Request No. 04-0019)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, an amendment is requested for the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS). The proposed amendment affects TS Section 6.0, "Administrative Controls," specifically: Section 6.1, "Responsibility;" Section 6.2, "Organization;" Section 6.3, "Facility Staff Qualifications;" Section 6.5, "Review and Audit;" Section 6.7, "Safety Limit Violation or Protective Limit Violation;" Section 6.8, "Procedures and Programs;" Section 6.9, "Reporting Requirements;" Section 6.14, "Process Control Program (PCP);" and Section 6.15, "Offsite Dose Calculation Manual (ODCM)." Associated with these changes are changes to the TS Index, TS Definition 1.30, "Process Control Program," and TS Section 2.1.2, "Safety Limits and Limiting Safety System Settings – Reactor Core."

The main purpose of this amendment application is to replace plant-specific position titles with generic position titles. Specifically, this amendment application proposes to change "Vice-President, Nuclear," to "specified corporate officer," "Plant Manager" to "plant manager," "Manager – Plant Operations" to "operations manager," "Operations Superintendent" to "assistant operations manager," and "Manager – Radiological Control" to "radiation protection manager". These proposed changes do not eliminate any of the qualifications, responsibilities, or requirements for these positions. The plant-specific titles will be identified in the DBNPS Updated Safety Analysis Report (USAR). These changes are consistent with NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3. Elimination of plant-specific position titles from the Technical Specifications will facilitate future plant organizational changes.

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In addition to the above-mentioned changes, several other changes to administrative requirements are proposed. The plant shutdown requirements and the reporting and notification requirements currently included in TS Section 6.7 are proposed to be deleted. These requirements are duplicative, governed by other regulations, or otherwise unnecessary. A proposed change to TS Section 2.1.2 is associated with the deletion of TS Section 6.7. The Process Control Program requirements of TS Section 6.8.1.h and TS Section 6.14 are proposed to be relocated to the USAR. These program requirements will continue to be adequately controlled under existing regulations. Associated with the proposed changes to TS Section 6.14, TS Definition 1.30 is proposed to be deleted. Also, TS Section 6.15.b is proposed to be modified to eliminate the requirement that changes to the ODCM be reviewed and accepted by the Plant Operations Review Committee (PORC). These changes to administrative requirements also eliminate the need to propose additional changes to plant-specific position/organizational titles. Each of these changes is also consistent with NUREG-1430.

Changes to TS Sections 6.5.3.1.a and 6.8.1.d are also proposed, revising "Industrial Security Plan" to "Physical Security Plan," to accurately reflect the current title of the Physical Security Plan.

Approval of the proposed amendment is requested by April 28, 2006. Once approved, the amendment shall be implemented within 120 days.

The proposed changes have been reviewed by the DBNPS Plant Operations Review Committee and Company Nuclear Review Board. Enclosure 1 includes an evaluation of the proposed amendment. A list of regulatory commitments made in this letter is included in Enclosure 2.

Should you have any questions or require additional information, please contact Mr. Henry L. Hegrat, Supervisor – Fleet Licensing, at (330) 315-6944.

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: April 20, 2005

By: 
Mark B. Bezilla, Vice President-Nuclear

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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

Docket Number 50-346
License Number NPF-3
Serial Number 2958
Enclosure 1

**DAVIS-BESSE NUCLEAR POWER STATION
EVALUATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 04-0019**

(43 pages follow)

**DAVIS-BESSE NUCLEAR POWER STATION
EVALUATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 04-0019**

Subject: License Amendment Application to Revise Administrative Controls

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1.0 DESCRIPTION

This letter is a request to amend the Davis-Besse Nuclear Power Station, Unit Number 1 (DBNPS) Facility Operating License Number NPF-3.

The proposed amendment affects TS Section 6.0, "Administrative Controls," specifically: Section 6.1, "Responsibility;" Section 6.2, "Organization;" Section 6.3, "Facility Staff Qualifications;" Section 6.5, "Review and Audit;" Section 6.7, "Safety Limit Violation or Protective Limit Violation;" Section 6.8, "Procedures and Programs;" Section 6.9, "Reporting Requirements;" Section 6.14, "Process Control Program (PCP);" and Section 6.15, "Offsite Dose Calculation Manual (ODCM)." Associated with these changes are changes to the TS Index, TS Definition 1.30, "Process Control Program," and TS Section 2.1.2, "Safety Limits and Limiting Safety System Settings – Reactor Core."

The main purpose of this amendment application is to replace plant-specific position titles with generic position titles. Specifically, this amendment application proposes to change "Vice-President, Nuclear," to "specified corporate officer," "Plant Manager" to "plant manager," "Manager – Plant Operations" to "operations manager," "Operations Superintendent" to "assistant operations manager," and "Manager – Radiological Control" to "radiation protection manager". These proposed changes do not eliminate any of the qualifications, responsibilities, or requirements for these positions. The plant-specific titles will be identified in the DBNPS Updated Safety Analysis Report (USAR). These changes are consistent with NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3. Elimination of plant-specific position titles from the Technical Specifications will facilitate future plant organizational changes.

In addition to the above-mentioned changes, several other changes to administrative requirements are proposed. The plant shutdown requirements and the reporting and notification requirements currently included in TS Section 6.7 are proposed to be deleted. These requirements are duplicative, governed by other regulations, or otherwise unnecessary. A proposed change to TS Section 2.1.2 is associated with the deletion of TS Section 6.7. The Process Control Program requirements of TS Section 6.8.1.h and TS Section 6.14 are proposed to be relocated to the USAR. These program requirements will continue to be adequately controlled under existing regulations. Associated with the proposed changes to TS Section 6.14, TS Definition 1.30 is proposed to be deleted. Also, TS Section 6.15.b is proposed to be modified to eliminate the requirement that changes to the ODCM be reviewed and accepted by the Plant Operations Review Committee (PORC). These changes to administrative requirements also eliminate the need to propose additional changes to plant-specific position/organizational titles. Each of these changes is also consistent with NUREG-1430.

Changes to TS Sections 6.5.3.1.a and 6.8.1.d are also proposed, revising "Industrial Security Plan" to "Physical Security Plan," to accurately reflect the current title of the Physical Security Plan.

2.0 PROPOSED CHANGE

The proposed changes described below are shown on the marked-up TS pages provided in Attachment 1.

Administrative Controls Section 6.1, "Responsibility"

It is proposed to revise TS 6.1.1, which presently states:

The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

to read (changes in italics):

The *plant manager* shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his/*her* absence.

Administrative Controls Section 6.2, "Organization"

TS 6.2.1 describes requirements related to offsite and onsite organizations. TS 6.2.2 describes requirements related to the facility staff. TS 6.2.3 describes requirements related to facility staff overtime.

It is proposed to revise TS 6.2.1, which presently states, in part:

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated Safety Analysis Report.
- b. The Vice President, Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

to read (changes in italics):

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels *up* to and

including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, *including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications*, shall be documented in the Updated Safety Analysis Report.

- b. *A specified corporate officer* shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The *plant manager* shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

In addition, it is proposed to revise TS 6.2.2.g, which presently states:

The Manager-Plant Operations shall either hold or have held a senior reactor operator's license on a pressurized water reactor. The Operations Superintendent shall hold a senior reactor operator license for the Davis-Besse Nuclear Power Station.

to read (changes in italics):

The *operations manager* shall either hold or have held a senior reactor operator's license on a pressurized water reactor. The *assistant operations manager* shall hold a senior reactor operator license for the Davis-Besse Nuclear Power Station.

Also, it is proposed to revise TS 6.2.3, which presently states, in part:

Any deviation from the working hour guidelines shall be authorized in advance by the Plant Manager or his designees, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the above guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee(s) to ensure that excessive hours have not been assigned.

to read (changes in italics):

Any deviation from the working hour guidelines shall be authorized in advance by the *plant manager* or his/*her* designees, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the above guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the *plant manager* or his/her designee(s) to ensure that excessive hours have not been assigned.

Administrative Controls Section 6.3, "Facility Staff Qualifications"

It is proposed to revise TS 6.3.1, which presently states:

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Manager - Radiological Control who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the Manager - Plant Operations whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

to read (changes in italics):

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the *radiation protection manager* who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the *operations manager* whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

Administrative Controls Section 6.5, "Review and Audit"

TS 6.5.3.1 describes requirements related to technical review and control activities. It is proposed to revise TS 6.5.3.1.a, which presently states, in part:

Plant procedures (including plant administrative procedures), Industrial Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures will be approved by procedurally authorized individuals.

to read (changes in italics):

Plant procedures (including plant administrative procedures), *Physical Security Plan* Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures will be approved by procedurally authorized individuals.

Administrative Controls Section 6.7, "Safety Limit Violation or Protective Limit Violation"

TS 6.7 presently describes actions to be taken in the event a Safety Limit or Protective Limit is violated. It is proposed to delete TS 6.7 in its entirety.

TS Section 2.1.2, "Safety Limits and Limiting Safety System Settings – Reactor Core"

The TS LCO 2.1.2 Action statement currently states: "Whenever the point defined by the combination of Reactor Coolant System flow, AXIAL POWER IMBALANCE and THERMAL POWER has exceeded the appropriate protective limit, be in HOT STANDBY within one hour, and comply with the requirements of Specification 6.7.2. Associated with the proposed changes to TS 6.7, it is proposed to delete the phrase: "and comply with the requirements of Specification 6.7.2."

Administrative Controls Section 6.8, "Procedures and Programs"

TS 6.8.1 lists activities which require written procedures to be established, implemented, and maintained. It is proposed to revise the title of one of these activities, TS 6.8.1.d, "Industrial Security Plan implementation," to (changes in italics): "*Physical Security Plan implementation.*" In addition, associated with the proposed changes to TS 6.14 (described below), it is proposed to delete one of these activities, TS 6.8.1.h, "The Process Control Program." This requirement will be relocated to the USAR.

Administrative Controls Section 6.9, "Reporting Requirements"

TS 6.9.1.11 describes requirements related to the Radioactive Effluent Release Report. Associated with the proposed changes to TS 6.14 (described below), it is proposed to revise TS 6.9.1.11, which presently states, in part:

The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP, and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

to read (changes in italics):

The material provided shall be (1) consistent with the objectives outlined in the ODCM and *the Process Control Program*, and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

Administrative Controls Section 6.14, "Process Control Program"

TS 6.14 presently describes requirements related to changes to the Process Control Program. It is proposed to delete TS 6.14 in its entirety. This requirement will be relocated to the USAR.

TS Definitions

TS 1.30 defines the term "Process Control Program." Associated with the proposed changes to TS 6.14, it is proposed to delete this definition.

TS Index

It is proposed to revise the TS Index to delete the entries for TS 1.30, TS 6.7, and TS 6.14.

Administrative Controls Section 6.15, "Offsite Dose Calculation Manual (ODCM)"

TS 6.15 presently describes requirements related to changes to the Offsite Dose Calculation Manual. It is proposed to revise TS 6.15.b, which presently states:

Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

to read (changes in italics)

Shall become effective after the approval of the *plant manager*.

Summary

The changes proposed by this license amendment application would revise the Administrative Controls Section of the DBNPS Technical Specifications to replace plant-specific position titles with generic position titles. TS Sections 6.1, "Responsibility," Section 6.2, "Organization," Section 6.3, "Facility Staff Qualifications," and Section 6.15, "Offsite Dose Calculation Manual (ODCM)," are affected. The plant-specific titles will be identified in the DBNPS Updated Safety Analysis Report (USAR).

In addition to the above-mentioned changes, several other changes to administrative requirements are proposed. The plant shutdown requirements and the reporting and notification requirements currently included in TS Section 6.7 are proposed to be deleted. These requirements are duplicative, governed by other regulations, or otherwise unnecessary. The Process Control Program requirements of TS Section 6.8.1.h and TS Section 6.14 are proposed to be relocated to the USAR. These program requirements will continue to be adequately controlled under existing regulations. Also, TS Section 6.15.b is proposed to be modified to eliminate the requirement that changes to the ODCM be reviewed and accepted by the Plant Operations Review Committee (PORC). These changes to administrative requirements also eliminate the need to propose additional changes to plant-specific position/organizational titles. Changes to the TS Definitions, the TS Index, and TS Section 2.1.2 are also proposed, consistent with these changes.

In addition, changes to TS Sections 6.5.3.1.a and 6.8.1.d are also proposed, revising "Industrial Security Plan" to "Physical Security Plan" to accurately reflect the current title of the Physical Security Plan.

The changes associated with the position/organizational titles are consistent with NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3. Elimination of plant-specific position/organizational titles from the Technical Specifications will facilitate future plant organizational changes.

3.0 BACKGROUND

The proposed changes affect the requirements for the Administrative Controls section of the TS. According to 10 CFR 50.36(c)(5), "Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

The proposed changes are primarily intended to make the plant-specific position/organizational titles found in the administrative controls section of the TS more generic. Description of plant specific titles will be contained in the USAR. Elimination of plant-specific position/organizational titles from the Technical Specifications will facilitate future plant organizational changes by eliminating the need to process a license amendment application. The proposed changes are modeled after NUREG-1430.

4.0 TECHNICAL ANALYSIS

Administrative Controls Section 6.1, "Responsibility"

It is proposed to revise TS 6.1.1 to use generic terminology in place of plant-specific position title terminology. In particular, the term "Plant Manager" would be replaced with the use of the term "plant manager". Use of this generic term is consistent with NUREG-1430 Section 5.1.1. In addition, the wording of TS 6.1.1 is proposed to be made more gender neutral via use of the term "his/her" in lieu of "his" in describing delegation of responsibilities. These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the position.

Administrative Controls Section 6.2, "Organization"

It is proposed to revise TS 6.2.1.a to add a requirement that plant-specific titles of personnel fulfilling the responsibilities of the positions delineated in the TS be documented in the USAR. This requirement is consistent with NUREG-1430 Section 5.2.1.a.

In addition, it is proposed to revise TS 6.2.1.b, TS 6.2.1.c, TS 6.2.2.g, and TS 6.2.3 to use generic terminology in place of plant-specific position title terminology. In particular, the terms "Vice President, Nuclear," "Plant Manager," "Manager-Plant Operations," and "Operations Superintendent" would be replaced with the use of the terms "specified corporate officer," "plant manager," "operations manager," and "assistant operations manager," respectively. Use of these generic terms is consistent with NUREG-1430 Sections 5.2.1.b, 5.2.1.c, 5.2.2.d, and 5.2.2.e.

Also, the wording of TS 6.2.3 is proposed to be made more gender neutral via use of the term "his/her" in lieu of "his" in describing delegation of responsibilities.

These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions.

Administrative Controls Section 6.3, "Facility Staff Qualifications"

It is proposed to revise TS 6.3.1 to use generic terminology in place of plant-specific position title terminology. In particular, the terms "Manager-Radiological Control" and "Manager-Plant Operations" would be replaced with the use of the terms "radiation protection manager" and "operations manager." Use of these generic terms is consistent with NUREG-1430 Sections 5.2.2.e and 5.7.2.a.1. These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions.

Administrative Controls Section 6.5, "Review and Audit"

It is proposed to make an administrative change to TS 6.5.3.1.a to accurately reflect the current title of the Physical Security Plan.

Administrative Controls Section 6.7, "Safety Limit Violation or Protective Limit Violation"

It is proposed to delete TS 6.7 in its entirety. This change is consistent with NUREG-1430, which does not specify separate requirements in the Administrative Controls section for safety limit or protective limit violations. Requirements similar to TS 6.7 were included in Section 2.0, "Safety Limits (SLs)," of NUREG-1430 Revision 1. However these requirements were removed via Technical Specification Task Force (TSTF) Traveler TSTF-5, Revision 1, which was approved by the NRC on June 11, 1996. The justification for the NUREG-1430 change, as stated in the TSTF-5 documentation, is as follows:

This change deletes requirements from the Technical Specifications that are duplicative or contained in other regulations or required to comply with regulations (10 CFR 50.36). The change is also consistent with Revision 0 change BWOG-09, which addressed several NRC and Industry initiatives to improve the content and presentation of Administrative Controls.

TS 6.7 mandates a plant shutdown within one hour in the event of a Safety Limit or Protective Limit violation. The plant shutdown requirements duplicate requirements found in the Action statements of TS Section 2.0, "Safety Limits." TS 6.7 also prescribes specific reporting and notification requirements in the event of a Safety Limit or Protective Limit violation. In the absence of these specific requirements currently found in TS 6.7, the DBNPS remains subject to the immediate notification and licensee event report requirements of 10 CFR 50.72 and 50.73. Based on these considerations, and consistent with NUREG-1430, the requirements found in TS 6.7 are unnecessary and may be deleted.

TS Section 2.1.2, "Safety Limits and Limiting Safety System Settings – Reactor Core"

It is proposed to delete the requirement in the TS LCO Action statement that refers to the need to comply with the requirements of TS 6.7.2. This change is consistent with the proposed changes to TS 6.7.

Administrative Controls Section 6.8, "Procedures and Programs"

TS 6.8.1 lists activities which require written procedures to be established, implemented, and maintained. It is proposed to make an administrative change to TS 6.8.1.d to accurately reflect the current title of the Physical Security Plan. In addition, associated with the proposed changes to TS 6.14 (described below), it is proposed to delete one of these activities, TS 6.8.1.h, "The Process Control Program." This requirement will be relocated to the USAR. The technical justification for the relocation of the Process Control Program requirements (see below discussion of Administrative Controls Section 6.14) is also applicable to the change to TS 6.8.1.h.

Administrative Controls Section 6.9, "Reporting Requirements"

TS 6.9.1.11 describes requirements related to the Radioactive Effluent Release Report. Associated with the proposed deletion of TS 1.30, which defines the "PCP" acronym, it is proposed to revise TS 6.9.1.11 to replace the acronym "PCP" with "Process Control Program." This is an editorial change.

Administrative Controls Section 6.14, "Process Control Program"

It is proposed to delete TS 6.14 in its entirety. This requirement will be relocated to the USAR. This change is consistent with NUREG-1430, which does not specify requirements in the Administrative Controls section for the Process Control Program. Requirements similar to TS 6.14 were included in Section 5.7.2.2 of NUREG-1430 Revision 0. However, these requirements were removed via Standard Technical Specification Change Traveler BWOG-09, Revision 0. The justification for the NUREG-1430 change, as stated in the BWOG-09 documentation, is as follows:

The markup proposed to relocate the TS program description for the Process Control Program (PCP). The PCP is described in the QA Plan, FSAR or appropriate plant procedures. The PCP implements the requirements of 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71. The regulatory controls for the proposed relocated document provide sufficient control of these requirements and removing these provisions from the TS is acceptable.

This proposal is consistent with the guidance provided in NRC's letter dated October 25, 1993.

The BWOG-09 documentation also notes that the NRC's correspondence to Owners Group Chairpersons, dated October 25, 1993, documented the Staff's conclusion that certain sections of the administrative controls chapter could be relocated to other licensee documents.

The DBNPS remains subject to the 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71 regulations, and these regulations provide an adequate level of control for the affected requirements.

Based on these considerations, and consistent with NUREG-1430, the requirements found in TS 6.14 are unnecessary and may be deleted and relocated to the USAR. Any future changes to the USAR will be adequately controlled under the requirements of 10 CFR 50.59.

TS Definitions

TS 1.30 defines the term "Process Control Program." Associated with the proposed changes to TS 6.14, it is proposed to delete this definition. This is an administrative change.

TS Index

It is proposed to revise the TS Index to delete the entries for TS 1.30, TS 6.7, and TS 6.14. These are administrative changes.

Administrative Controls Section 6.15, "Offsite Dose Calculation Manual (ODCM)"

It is proposed to revise TS 6.15.b to use generic terminology in place of plant-specific position title terminology. In particular, the term "Plant Manager" would be replaced with the use of the term "plant manager". Use of this generic term is consistent with NUREG-1430 Section 5.5.1. This change is administrative and does not modify the qualifications, responsibilities, or requirements for the position.

In addition, it is proposed to revise TS 6.15.b to eliminate the requirement that changes to the ODCM be reviewed and accepted by the PORC prior to becoming effective. This change is consistent with NUREG-1430 Section 5.5.1, which does not specify a requirement comparable to the PORC requirement specified in TS 6.15.b. In addition, USAR Section 13.4.1, "Plant Operations Review Committee (PORC)," presently states that the PORC shall be responsible for the review of changes to the ODCM. Therefore, inclusion of this requirement in the TS is an unnecessary detail. Any future changes to the USAR will be adequately controlled under the requirements of 10 CFR 50.59.

Based on these considerations, and consistent with NUREG-1430, the PORC-related requirement found in TS 6.15.b is unnecessary and may be deleted.

Summary

In summary, the proposed changes are consistent with NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3, are administrative in nature, and will not have any adverse effect on plant safety.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

The changes proposed by this license amendment application would revise the Administrative Controls Section of the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS) Technical Specifications (TS) to replace plant-specific position titles with generic position titles. TS Sections 6.1, "Responsibility," Section 6.2, "Organization," Section 6.3, "Facility Staff Qualifications," and Section 6.15, "Offsite Dose Calculation Manual (ODCM)," are affected. The plant-specific titles will be identified in the DBNPS Updated Safety Analysis Report (USAR).

In addition to the above-mentioned changes, several other changes to administrative requirements are proposed. The plant shutdown requirements and the reporting and notification requirements currently included in TS Section 6.7 are proposed to be deleted. These requirements are duplicative, governed by other regulations, or otherwise unnecessary. The Process Control Program requirements of TS Section 6.8.1.h and TS Section 6.14 are proposed to be relocated to the USAR. These program requirements will continue to be adequately controlled under existing regulations. Also, TS Section 6.15.b is proposed to be modified to eliminate the requirement that changes to the ODCM be reviewed and accepted by the Plant Operations Review Committee (PORC). USAR Section 13.4.1, "Plant Operations Review Committee (PORC)," presently states that the PORC shall be responsible for the review of changes to the ODCM. These changes to administrative requirements also eliminate the need to propose additional changes to plant-specific position/organizational titles. Changes to the TS Definitions, the TS Index, and TS Section 2.1.2 are also proposed, consistent with these changes.

In addition, changes to TS Sections 6.5.3.1.a and 6.8.1.d are also proposed, revising "Industrial Security Plan" to "Physical Security Plan" to accurately reflect the current title of the Physical Security Plan.

The changes associated with the position/organizational titles are consistent with NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3. Elimination of plant-specific position/organizational titles from the Technical Specifications will facilitate future plant organizational changes.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes affect the requirements for the administrative controls section of the Technical Specifications. The proposed changes are primarily intended to make the plant-specific position/organizational titles found in the administrative controls section of the Technical Specifications more generic. The proposed changes do not affect any plant structures, systems, and components, and have no effect on plant operations. The proposed changes are administrative and do not affect any existing limits. Accident initial conditions, probability, and assumptions remain as previously analyzed. The proposed changes will have no effect on accident initiation frequency. The proposed changes do not invalidate the assumptions used in evaluating the radiological consequences of any accident. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes are administrative and do not introduce any new or different accident initiators. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed changes are administrative and will not have a significant effect on any margin of safety. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The function of the "Administrative Controls" section of the Technical Specifications, as stated in 10 CFR 50.36(c)(5), is to provide "provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." Under the proposed changes, TS Section 6.0 will continue to meet these objectives.

Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)," February 1978, states that the requirements included in American National Standards Institute (ANSI) N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," are acceptable to the NRC staff and provide an adequate basis for complying with the quality assurance requirements of Appendix B to 10 CFR Part 50, subject to listed provisions. The proposed changes do not affect the First Energy Nuclear Operating Company (FENOC) Quality Assurance Program Manual (QAPM) commitment (subject to the alternatives and clarifications described in the QAPM) to the requirements of RG 1.33 and the endorsed standard.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the NRC's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. DBNPS Operating License NPF-3, Appendix A Technical Specifications through Amendment 262.
2. DBNPS Updated Safety Analysis Report through Revision 24.
3. NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants," Revision 3.
4. Industry/Technical Specification Task Force Standard Technical Specification Change Traveler TSTF-5, Revision 1, "Delete Safety Limit Violation Notification Requirements."
5. Standard Technical Specification Change Traveler BWOG-09, Revision 0, "Administrative Controls."
6. NRC letter dated October 25, 1993, William T. Russell to Owners Group Chairpersons, "Content of Standard Technical Specifications, Section 5.0, Administrative Controls."
7. Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)," February 1978.
8. American National Standards Institute (ANSI) N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."

8.0 ATTACHMENTS

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

LAR 04-0019
Attachment 1

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

(13 pages follow)

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DEFINITIONS

1.29 Deleted

PROCESS CONTROL PROGRAM

1.30 The ~~PROCESS CONTROL PROGRAM (PCP)~~ shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste. Deleted

1.31 Deleted

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.32 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specifications 6.9.1.10 and 6.9.1.11.

1.33 Deleted

1.34 Deleted

1.35 Deleted

1.36 Deleted

MEMBER(S) OF THE PUBLIC

1.37 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the plant.

SITE BOUNDARY

1.38 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

REACTOR CORE

2.1.1 The combination of the reactor coolant core outlet pressure and outlet temperature shall not exceed the safety limit shown in Figure 2.1-1.

APPLICABILITY: MODES 1 and 2.

ACTION:

Whenever the point defined by the combination of reactor coolant core outlet pressure and outlet temperature has exceeded the safety limit, be in HOT STANDBY within one hour.

REACTOR CORE

2.1.2 The combination of reactor THERMAL POWER and AXIAL POWER IMBALANCE shall not exceed the protective limit shown in the CORE OPERATING LIMITS REPORT for the various combinations of three and four reactor coolant pump operation.

APPLICABILITY: MODE 1.

ACTION:

Whenever the point defined by the combination of Reactor Coolant System flow, AXIAL POWER IMBALANCE and THERMAL POWER has exceeded the appropriate protective limit, be in HOT STANDBY within one hour, ~~and comply with the requirements of Specification 6.7.2.~~

REACTOR COOLANT SYSTEM PRESSURE

2.1.3 The Reactor Coolant System pressure shall not exceed 2750 psig.

APPLICABILITY: MODES 1, 2, 3, 4 and 5.

ACTION:

MODES 1 and 2 - Whenever the Reactor Coolant System pressure has exceeded 2750 psig, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within one hour.

MODES 3, 4 and 5 - Whenever the Reactor Coolant System pressure has exceeded 2750 psig, reduce the Reactor Coolant System pressure to within its limit within 5 minutes.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The ~~Plant Manager~~ plant manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his/her absence.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels up to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Updated Safety Analysis Report.
- b. ~~The Vice President, Nuclear~~ A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The ~~Plant Manager~~ plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.2 FACILITY STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control panel area when fuel is in the reactor.
- c. At least two licensed Operators, one of which has a Senior Reactor Operator license, shall be present in the control room while in MODES 1, 2, 3, or 4.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor[#].
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Deleted
- g. The ~~Manager-Plant Operations~~ operations manager shall either hold or have held a senior reactor operator's license on a pressurized water reactor. The ~~Operations-Superintendent~~ assistant operations manager shall hold a senior reactor operator license for the Davis-Besse Nuclear Power Station.

[#] The individual qualified in radiation protection procedures may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

ADMINISTRATIVE CONTROLS

FACILITY STAFF OVERTIME

6.2.3 Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the ~~Plant Manager~~plant manager or his/her designees, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the above guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Manager~~plant manager or his/her designee(s) to ensure that excessive hours have not been assigned.

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the ~~Manager—Radiological Control~~ radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the ~~Manager—Plant Operations~~ operations manager whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

6.4 Deleted

6.5 REVIEW AND AUDIT

6.5.1 Deleted

6.5.2 Deleted

Pages 6-6 through 6-11 have been deleted. The next page is 6-12.

ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Plant procedures required by Section 6.8.1 and changes thereto shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Plant procedures, (including plant administrative procedures), ~~Industrial-Physical~~ Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures will be approved by procedurally authorized individuals.
- b. Temporary approval of changes to plant procedures cited in Section 6.8.1 which clearly do not change the intent of the approved procedures, can be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. For changes to plant procedures, which may involve a change in intent of the approved

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION OR PROTECTIVE LIMIT VIOLATION~~Deleted~~

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. ~~The facility shall be placed in at least HOT STANDBY within one hour.~~
- b. ~~The Safety Limit violation shall be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour. In addition the Vice President, Nuclear and the CNRB shall be notified within 24 hours.~~
- c. ~~A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Operations Review Committee (PORC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~
- d. ~~The Safety Limit Violation Report shall be submitted to the Commission, the CNRB and the Vice President, Nuclear within 14 days of the violation.~~

6.7.2 The following actions shall be taken in the event the Protective Limit of Specification 2.1.2 is violated:

- a. ~~The facility shall be placed in at least HOT STANDBY within one hour.~~
- b. ~~The Protective Limit violation shall be reported to the NRC Operations Center by telephone as soon as possible and in all cases within one hour. In addition the Vice President, Nuclear and the CNRB shall be notified within 24 hours.~~
- c. ~~A Protective Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~
- d. ~~The Protective Limit Violation Report shall be submitted to the CNRB and the Vice President, Nuclear within 14 days of the violation.~~

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, February, 1978.
- b. Refueling operations.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS (Continued)

- c. Surveillance and test activities of safety related equipment.
- d. ~~Industrial~~ Physical Security Plan implementation.
- e. Davis-Besse Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. The radiological environmental monitoring program.
- h. ~~The Process Control Program Deleted.~~
- i. Offsite Dose Calculation Manual implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as set forth in 6.5.3 above.

6.8.3 (deleted)

6.8.4 The following programs shall be established, implemented and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling and reactor coolant drain systems. The program shall include the following:

- (i) Preventive maintenance and/or periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.10 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.11 The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP~~the~~ Process Control Program, and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

ADMINISTRATIVE CONTROLS

6.14 PROCESS CONTROL PROGRAM (PCP) Deleted

Changes to the PCP:

- ~~a. Shall be documented and records of reviews performed shall be retained as required by the USAR Chapter 17 Quality Assurance Program. This documentation shall contain:
 - ~~1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and~~
 - ~~2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.~~~~
- ~~b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.~~

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the USAR Chapter 17 Quality Assurance Program. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager plant manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

LAR 04-0019
Attachment 2

**PROPOSED RETYPED
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(13 pages follow)

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DEFINITIONS

1.29 Deleted

1.30 Deleted

1.31 Deleted

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.32 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specifications 6.9.1.10 and 6.9.1.11.

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SITE BOUNDARY

1.38 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

REACTOR CORE

2.1.1 The combination of the reactor coolant core outlet pressure and outlet temperature shall not exceed the safety limit shown in Figure 2.1-1.

APPLICABILITY: MODES 1 and 2.

ACTION:

Whenever the point defined by the combination of reactor coolant core outlet pressure and outlet temperature has exceeded the safety limit, be in HOT STANDBY within one hour.

REACTOR CORE

2.1.2 The combination of reactor THERMAL POWER and AXIAL POWER IMBALANCE shall not exceed the protective limit shown in the CORE OPERATING LIMITS REPORT for the various combinations of three and four reactor coolant pump operation.

APPLICABILITY: MODE 1.

ACTION:

Whenever the point defined by the combination of Reactor Coolant System flow, AXIAL POWER IMBALANCE and THERMAL POWER has exceeded the appropriate protective limit, be in HOT STANDBY within one hour.

REACTOR COOLANT SYSTEM PRESSURE

2.1.3 The Reactor Coolant System pressure shall not exceed 2750 psig.

APPLICABILITY: MODES 1, 2, 3, 4 and 5.

ACTION:

MODES 1 and 2 - Whenever the Reactor Coolant System pressure has exceeded 2750 psig, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within one hour.

MODES 3, 4 and 5 - Whenever the Reactor Coolant System pressure has exceeded 2750 psig, reduce the Reactor Coolant System pressure to within its limit within 5 minutes.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The plant manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his/her absence.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels up to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Updated Safety Analysis Report.
- b. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.2 FACILITY STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control panel area when fuel is in the reactor.
- c. At least two licensed Operators, one of which has a Senior Reactor Operator license, shall be present in the control room while in MODES 1, 2, 3, or 4.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor[#].
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. Deleted
- g. The operations manager shall either hold or have held a senior reactor operator's license on a pressurized water reactor. The assistant operations manager shall hold a senior reactor operator license for the Davis-Besse Nuclear Power Station.

[#] The individual qualified in radiation protection procedures may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

ADMINISTRATIVE CONTROLS

FACILITY STAFF OVERTIME

6.2.3 Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the plant manager or his/her designees, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the above guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant manager or his/her designee(s) to ensure that excessive hours have not been assigned.

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the operations manager whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

6.4 Deleted

6.5 REVIEW AND AUDIT

6.5.1 Deleted

6.5.2 Deleted

Pages 6-6 through 6-11 have been deleted. The next page is 6-12.

ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Plant procedures required by Section 6.8.1 and changes thereto shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Plant procedures, (including plant administrative procedures), Physical Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures will be approved by procedurally authorized individuals.
- b. Temporary approval of changes to plant procedures cited in Section 6.8.1 which clearly do not change the intent of the approved procedures, can be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. For changes to plant procedures, which may involve a change in intent of the approved

ADMINISTRATIVE CONTROLS

6.7 Deleted

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, February, 1978.
- b. Refueling operations.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS (Continued)

- c. Surveillance and test activities of safety related equipment.
- d. Physical Security Plan implementation.
- e. Davis-Besse Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. The radiological environmental monitoring program.
- h. Deleted.
- i. Offsite Dose Calculation Manual implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as set forth in 6.5.3 above.

6.8.3 (deleted)

6.8.4 The following programs shall be established, implemented and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling and reactor coolant drain systems. The program shall include the following:

- (i) Preventive maintenance and/or periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.10 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.11 The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and the Process Control Program, and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

ADMINISTRATIVE CONTROLS

6.14 Deleted

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the USAR Chapter 17 Quality Assurance Program. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after the approval of the plant manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Docket Number 50-346
License Number NPF-3
Serial Number 2958
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 SUPERVISOR – FLEET LICENSING (330-315-6944) OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

COMMITMENTS	DUE DATE
Describe plant-specific titles in the Updated Safety Analysis Report (USAR).	Upon implementation of amendment.
Relocate the requirements of TS Section 6.8.1.h and TS Section 6.14 to the USAR.	Upon implementation of amendment.