



FirstEnergy Nuclear Operating Company

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Docket Numbers 50-346, 72-14

License Number NPF-3

Serial Number 3090

September 3, 2004

Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Document Control Desk

Subject: Response to Order for Implementation of Additional Security Measures Associated
with Access Authorization for the Davis-Besse Nuclear Power Station

Ladies and Gentlemen:

The FirstEnergy Nuclear Operating Company (FENOC) has reviewed and consents to the Order for Implementation of Additional Security Measures Associated with Access Authorization for the Davis-Besse Nuclear Power Station (DBNPS), issued on August 18, 2004 (EA-03-097). This Order, which modifies the license for the DBNPS Independent Spent Fuel Storage Installation (ISFSI), requires a response regarding the implementation of the requirements set forth in Attachment 1 to the Order.

In response to the Order for Interim Safeguards and Security Compensatory Measures for the operating license for the DBNPS issued on January 7, 2003, actions were taken as described in FENOC's response dated January 27, 2003 (letter Serial Number 2832) and the supplemental response dated July 7, 2003 (letter Serial Number 2971). On January 29, 2004, FENOC notified the NRC that the actions taken to comply with the Interim Compensatory Measures related to Access Authorization were complete (letter Serial Number 3018).

At the DBNPS, the ISFSI is wholly contained within the Protected Area of the DBNPS. Therefore, when FENOC implemented the compensatory measures for Access Authorization for operating power reactors issued January 7, 2003, these compensatory measures also included the ISFSI at the DBNPS. In accordance with Attachment 1 of the August 18, 2004 Order, the implementation of these compensatory measures represents an acceptable alternate means of complying with the Order, and no further actions are required.

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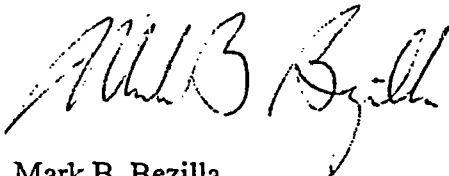
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The FENOC considers all notifications and submittals with respect to the August 18, 2004 Order to be complete for the DBNPS ISFSI, based upon the full implementation of and compliance with the requirements of the Order as described above. If there are any questions concerning this matter, please contact Mr. David R. Kline, Manager – Security, at (419) 249-2322.

The statements contained in this submittal, including its associated 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 September 3, 2004.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark B. Bezilla".

Mark B. Bezilla

GMW

Attachments:

1) Commitment List

cc: J. L. Caldwell, Regional Administrator, NRC Region III
J. B. Hopkins, DB-1 NRC/NRR Senior Project Manager
C. S. Thomas, DB-1 Senior Resident Inspector
Utility Radiological Safety Board
NRC Document Control Desk

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Director – Performance Improvement (419) 321-7181 at Davis-Besse of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

None

N/A