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May 30, 2006

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Davis-Besse Nuclear Power Station (DBNPS)
Fourth Supplement Regarding License Amendment Application to Revise Technical Specification (TS) 3/4.3.2.1, Safety Features Actuation System (SFAS) Instrumentation Setpoints and Surveillance Testing
(License Amendment Request (LAR) 03-0014; TAC No. MC3084)

Ladies and Gentlemen:

This letter responds to an informal NRC request for additional information (RAI) regarding LAR 03-0014.

By letter dated May 5, 2004 (Serial Number 3009), the FirstEnergy Nuclear Operating Company (FENOC) submitted an application for amendment of the Operating License, Appendix A, Technical Specifications (TS) for the DBNPS. Among other changes, the proposed amendment would: revise the "Allowable Values" entries for Safety Features Actuation System (SFAS) Functional Unit Sequence Logic Channel "a", "Essential Bus Feeder Breaker Trip (90%)", and SFAS Functional Unit Sequence Logic Channel "b", "Diesel Generator Start, Load Shed on Essential Bus (59%)"; rename these trip relays to more accurately reflect their design function; and establish annual calibration requirements for these same Functional Units, consistent with updated calculations and current setpoint methodology. The proposed changes incorporate administrative limits presently maintained by the DBNPS to ensure adequate voltage is provided to safety-related loads, and to preclude inadvertent actuation of the 4160 Volt Loss of Voltage Relay (LVR) logic.

On August 20, 2004, the NRC staff requested information regarding the electromechanical Loss of Voltage Relays, which were previously removed by modification, and the replacement solid state Loss of Voltage Relays. On

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October 12, 2004, FENOC representatives met with NRC staff at NRC Headquarters to discuss the NRC's request for additional information, and to present the associated instrument setpoint calculation. By letter dated January 17, 2005 (Serial Number 3100), FENOC provided a written response to the NRC staff's request for additional information.

On July 19, 2005, the NRC staff informally requested FENOC to respond to a generic request for additional information included in a March 31, 2005 letter from James A. Lyons, NRC, to Mr. Alex Marion, Nuclear Energy Institute (ADAMS ML050870008). The FENOC response to this request was provided on November 2, 2005 (Serial Number 3193).

By letter dated October 10, 2005 (Serial Number 3186), FENOC proposed an additional TS change to add a footnote to TS Table 4.3-2, "Safety Features Actuation System Instrumentation Surveillance Requirements," regarding the as-left instrument setting. This proposed change is consistent with the NRC position described in the March 31, 2005 letter from James A. Lyons, NRC, to Mr. Alex Marion, Nuclear Energy Institute.

On March 23, 2006, the NRC informally provided the following additional question:

> *During the channel calibration and channel functional test, (sic) the result exceeds the calibration tolerance, then the licensee has stated that they will recalibrate the instrument within the calibration tolerance value before returning it to operable status. My question is do they declare it inoperable prior to recalibration and also do they include it in their corrective action program. If they do this, then where is this covered, for example in their instrument calibration procedure or some other place. Also it is (sic) added to their trending program.*

FENOC Response

During relay calibration, the associated 27N relay is removed from its case and replaced by a dummy trip device. This causes the affected undervoltage unit to be placed in the trip condition. This is a TS requirement that must be performed within one hour. The instrument is inoperable from the moment it is removed to do the calibration until the time it is replaced by a calibrated instrument – regardless of whether the instrument exceeded the calibration tolerance or not. This is addressed in the calibration procedure.

During relay functional testing, the associated channels are forced into and out of the trip condition several times. This reduces the number of functional Sequence Logic Channels to less than the "minimum units operable" required by TS. Therefore, similar to calibration, operability is affected, regardless of whether the channel meets the required tolerances. This is addressed in the TS functional test procedure.

The FENOC Corrective Action Program requires initiation of a condition report whenever an adverse condition is identified. Failure to meet surveillance acceptance criteria for TS instruments would be considered an adverse condition. Currently, the associated procedures require notification of the supervisor if functional test acceptance criteria are not met, and notification of engineering if calibration as-found acceptance criteria are not met.

In addition to equipment trend analyses required by the FENOC corrective action program, the DBNPS trend analysis program has been strengthened by adding trend analyses of the results of the calibrations and functional tests related to LAR 03-0014 to the system engineer's system performance book in accordance with DBNPS Business Practice DBBP-PES-0001, System and Component Trending.

The supplemental information provided in this letter does not affect the conclusion of the license amendment application that the proposed changes do not involve a significant hazards consideration and do not have an adverse effect on nuclear safety.

Attachment 1, Commitment List, identifies that there are no commitments contained in this letter. Should you have any questions or require additional information, please contact Mr. Gregory A. Dunn, Manager – Fleet Licensing, at (330) 315-7243.

The statements contained in this submittal, including its associated enclosures, are 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: May 30, 2006

By: _____
Mark B. Bezilla, Vice President-Nuclear

MSH

Attachment 1: Commitment List

cc: Regional Administrator, NRC Region III
DB-1 NRC/NRR Project Manager
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station, Unit Number 1, (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 Gregory A. Dunn, Manager – Licensing (330-315-7243) of any questions regarding this document or associated regulatory commitments.

COMMITMENTS	DUE DATE
None.	Not applicable.