

9/11/07  
Slides

FirstEnergy Nuclear Operating Co. (FENOC)  
**Meeting to Discuss Davis-Besse  
License Amendment Request for  
Conversion to Improved Technical  
Specifications (ITS)**

(LAR No. 06-0003; August 3, 2007)

September 11 – 12, 2007  
9:00 AM ~ 4:00 PM

U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike, Room O-04B6  
Rockville, Maryland

# **NRC Introductions (1 of 3)**

- Division of Operating Reactor Licensing (DORL)
  - Thomas Wengert – Davis-Besse Project Mgr.
  - Russell Gibbs – Chief, Plant Licensing Branch III-2
- Technical Specifications Branch (ITSB)
  - Ross Telson – Davis-Besse ITS Conv. Mgr.
  - Timothy Kobetz – Chief, ITSB

# NRC Introductions (2 of 3)

## ▼ ITS Conversion Section Lead Reviewers

- |                   |                                |
|-------------------|--------------------------------|
| – Bill Cartwright | 3.6 Containment Systems        |
|                   | 3.7 Plant Systems              |
|                   | 3.9 Refueling Operations       |
| – Robert Clark    | 3.8 Electrical Power System    |
| – Timothy Kolb    | 3.4 Reactor Cooling System     |
| – Aron Lewin      | 3.3 Instrumentation            |
| – Carl Schulten   | 1.0 Use & Application          |
|                   | 2.0 Safety Limits              |
|                   | 3.0 LCO & SR Applicability     |
| – Ross Telson     | 3.5 Emergency Core Cooling     |
| – Gerald Waig     | 3.1 Reactivity Control Systems |
|                   | 3.2 Power Distribution Limits  |
|                   | 4.0 Design Features            |
|                   | 5.0 Administrative Controls    |

# NRC Introductions (3 of 3)

- Current Identified BSI (Beyond-Scope Issue), ESI (Emerging Staff Issue), and other non-ITSB Tech. Support Leads:
  - George Wilson, Jr. – Chief, Electrical Engineering Branch (EEEB)
  - Gregory Cranston – Chief, Reactor Systems Branch (SRXB)
  - William Kemper – Chief, Instrumentation & Controls Branch (EICB)
  - Michelle Hart – Chief, Accident Dose Branch (AADB)

# FENOC Davis-Besse Introductions

- ▶ William Bentley – FENOC Davis-Besse ITS Conversion Project Mgr.
- ▶ ... (per FENOC/Davis-Besse)

# Review & Approve Agenda

## (Day 1 of 2)

### Day 1

- Introductions
- Project Overview (proposed agenda addition)
- Review/resolve pending application acceptance review items
- Discussion of informal vs. Official Agency Records
- Review conversion “beyond-scope” items
- Ratify project plan (schedule milestones, status meetings, etc.)
- Discussion of project plan revision process
- Opportunity for public comment

# Review & Approve Agenda

(Day 2 of 2)

## Day 2

- Just-in-time training & issuance of passwords for NRC staff to submit questions to on-line Q&A database to facilitate accelerated review
- Review select portions of draft NRC office instruction LIC-601 (“Technical Specification Conversion Accelerated Review”) guidance
- Continuation of topics scheduled, but not completed, from Day 1 agenda
- Other emergent discussion topics, as needed
- Opportunity for public comment
- Adjourn

# Project Overview (1 of 2)

## (Proposed Agenda Addition)

### ➤ Scope

- LAR 06-0003 is 3,528 pages  
(including cover letter & 17 volumes; excluding two pending LARs and anticipated future supplements)
  - CTS Markup
  - NUREG Markup (Proposed ITS)
  - Discussion of Changes (DOCs)
  - Justification for Deviations (JFDs)
- Staff review is currently estimated at:
  - ~ 1 year and ~ 2,500 staff-hours (excluding BSIs)
  - Support & coordination of ~ 6 NRR branches
  - An Issuance Package ~ 700-800 pages including Safety Evaluation, ITS, DOCs, ...
  - Final estimates are pending; updates are not uncommon as BSI's surface throughout the review...



# Project Overview (2 of 2)

## (Proposed Agenda Addition)

- ✓ ~20 Currently-Identified Out-of-Scope Issues or “OSIs” (*issues that warrant non-ITSB Technical Branch input*) were identified either by D-B or Staff during acceptance review:
  - ~17 are Beyond-Scope Issues or “BSIs”
    - ✓ ~13 are licensee-ID’d (LB); ~4 are staff-ID’d (SB)
    - ✓ BSI’s are ITS elements that are neither congruent with CTS nor STS (NUREG) AND can not be promptly justified by ITSB staff as acceptable due to a unique site-specific CLB-related condition
  - ~2 of the OSI’s are Emerging Staff Issues or “ESIs” (SE)
    - ✓ ESI’s involve non-ITSB Tech Branch concerns or staff positions that diverge from a proposed ITS which is otherwise congruent with either CTS or STS (or which might have otherwise been justified as acceptable by LR’s due to a unique site-specific CLB-related condition)

# Review/Resolve Pending Application Acceptance Review Items

- Staff have identified no items that would prevent acceptance of your application for review
- However, a number of items were identified which, we recommend for your consideration to promote a more efficient, effective, and timely review
- Unlike acceptance issues, your address of these items is voluntary. Presently, none of these items have been determined essential to the disposition of your application (though that will likely change during the course of the review)

# Recommended Application Items

*(Recommendations – not requirements)*

- ✓ Official submittal of items in the compact disk shared with staff (preferably in acceptable electronic format):
  - Clean ITS & Bases
  - CTS & Bases
  - D-B UFSAR
  - Ops Schematics
  - DOC Tables
  - BSI's
- ✓ Supplement addressing issues identified during Acceptance Review:
  - Staff- and Licensee-Identified BSI's
  - DOC's and JFD's which are not fully effective in describing changes
  - Other identified corrections being consolidated for our acceptance letter

# Discussion of Informal vs. OFFICIAL Agency Records

- NRR Office Instruction COM-203 "Informal Interfacing and Exchange of Information with Licensees and Applicants:"
  - **Regulations require** that all license applications, requests for amendments and associated correspondence be submitted in writing or by authorized electronic submission (Electronic Information Exchange (EIE) or CD-ROM)
  - It is NRC policy to make ***all correspondence used to support decision making*** an ***official agency record*** and to make it publicly available by placing a copy into ADAMS, unless exempted ...
  - ***Information informally exchanged*** with licensees or applicants, ***and used in decision making***, must be properly documented to ensure public disclosure and allow public participation in the decision making process.

# Review ITS Conversion “Beyond-scope” Items

## ▼ **BSI's Are...**

- BSI's are ITS elements in the application that are neither congruent with CTS nor STS (NUREG) AND can not be promptly justified by ITSB staff as acceptable due to a unique site-specific CLB-related condition

## ▼ **17 Currently-Identified BSI's (14 TACs):**

- 5 BSI's itemized in your application (5 TACs)
- 3 of 4 BSI's from 8/29 WJBentley email (3 TACs)
- 5 BSI's regarding 2 LARs (2 TACs)
- 4 staff-identified BSIs (4 TACs)

# Current Summary of BSI's

O S I #	T Y P E	TAC	ITSB Lead	Tech Br & POC	ITS	Title / Issue
1	L B	<u>MD6399</u>	Lewin	EEEB	3.3.8	<b>BSI-1 SFAS SR Requirements</b> (EDG Degraded Voltage & Loss of Voltage Channel Checks)
2	L B	<u>MD6400</u>	Lewin	EICB SRXB	3.3.11	<b>BSI-2 Steam &amp; Feedwater Rupture Control Sys. Trip Setpoints</b>
3	L B	<u>MD6401</u>	Kolb	SRXB	3.4.1	<b>BSI-3 DNB Margin</b> (for reactor pressure)
4	L B	<u>MD6402</u>	Kolb	SRXB	LCO 3.4.4	<b>BSI-4 RCS Loop, Modes 1&amp;2 Change of CTS</b> (Reactor Coolant Loops and Coolant Circulation)
5	L B	<u>MD6403</u>	Telson	SRXB EICB	LCO 3.5.1...	<b>BSI-5 ECCS-Core Flooding Tanks</b>
6	L B	<u>MD4421</u>	Cartwright	TBD	3.9.3	<b>Administrative Control of Penetrations during Refueling</b> (Pending LAR No. 06-0002; Feb 12, 2007)
7	L B	<u>MD5240</u>	Schulten	SRXB EICB AADB	1.0	<b>Measurement Uncertainty Recapture Power Uprate (MU)</b> (Pending LAR No. 05-0007; April 12, 2007).
8	L B	<u>MD5240</u>	Lewin	SRXB EICB AADB	3.3.1	<b>Measurement Uncertainty Recapture Power Uprate (MU)</b> (Pending LAR No. 05-0007; April 12, 2007)
9	L B	<u>MD5240</u>	Cartwright	SRXB EICB AADB	3.7.6	<b>Measurement Uncertainty Recapture Power Uprate (MU)</b> (Pending LAR No. 05-0007; April 12, 2007)

# Current Summary of BSI's

OSI #	TYPE	TAC	ITSB Lead	Tech Br & POC	ITS	Title / Issue
10	LB	<u>MD5240</u>	Waig	SRXB EICB AADB	5.6.3c	Measurement Uncertainty Recapture Power Uprate (MU) (Pending LAR No. 05-0007; April 12, 2007)
11	SB	<u>MD6644</u>	Kolb	SRXB Desai	SR 3.4.1	BSI-6 M1 RCS Flow Surveillance
12	SB	<u>MD6645</u>	Clark	EEEB Wilson	SR 3.8.1.13	BSI-7 (OSI-12) Diesel Generator Endurance Run
15	SB	<u>MD6646</u>	Waig & Clark	EEEB Wilson	ITS 5.5.16	BSI-8 (OSI-15) Battery Monitoring & Maintenance Program ITS 5.5.16
16	SB	<u>MD6647</u>	Waig	SRXB	LCO 3.2.5 Action A.2	BSI-9 (OSI-16) Power Distr Limit ITS LCO 3.2.5 A.
17	LB	<u>MD6648</u>	Waig	SRXB	3.1.9	BSI-10 (OSI-17) Incorporation of TSTF-467T ITS 3.1.9
18	LB	<u>MD6684</u>	Waig	SRXB	3.2.1 Action A.2.	BSI-12 (OSI-18) Rod Insertion Limits ITS 3.2.1 Action A.2
19	LB	<u>MD6649</u>	Clark	EEEB Wilson	SR 3.8.1.10	BSI-11 (OSI-19) Diesel Generator Load Rejection Surveillance ITS SR 3.8.1.10

# Ratify Project Plan

## (Schedule Milestones, Status Meetings, Etc.)

Major Tasks & Milestones	Start	Finish
<b>D-B / FENOC Submits ITS Conversion Req. (LAR 06-0003)</b>	<b>8/3/2007</b>	n/a
LAR in ADAMS and ITS Conversion In-scope Review TACS Issued	8/6/2007	8/13/2007
Lead Reviewers (LRs) In-Scope Enhanced Acceptance Review	8/14/2007	9/4/2007
<b>LR &amp; Tech Branch OSI Detailed Review &amp; Q&amp;A / RAI Period</b>	<b>8/31/2007</b>	<b>2/14/2008</b>
<b>Licensee Q&amp;A Responses &amp; Formal Closeout Submittals</b>	<b>9/25/2007</b>	<b>3/14/2008</b>
<b>NRC Issues Acceptance &amp; Schedule Confirmation Letter</b>	<b>Milestone</b>	<b>10/1/2007</b>
Tech Branch OSI SE Inputs to ITSB LR's	Milestone	3/27/2008
LR's Verify Formal Closeout Submittals	1/10/2008	4/21/2008
<b>DRAFT SE to Licensee For Factual Information Verification</b>	<b>Milestone</b>	<b>5/12/2008</b>
<b>Licensee Provides Comments on DRAFT SE to NRC</b>	<b>5/12/2008</b>	<b>5/27/2008</b>
OGC Review of DRAFT SE/LAR	6/10/2008	7/9/2008
<b>NRC Issues FINAL SE/LAR</b>	<b>Milestone</b>	<b>7/30/2008</b>



# Project Plan Revision Process

## ✔ **Anticipated or Actual Schedule Delay**

- causing party should promptly inform the other party and coordinate and publish an appropriately revised schedule. The cause of the schedule delay should be documented along with the agreed-upon revised schedule.

## ✔ **Changes that don't delay projected LAR issuance date**

- may be accomplished informally with the mutual concurrence of the impacted stakeholders.

## ✔ **Early completion of any activity**

- will not necessitate schedule revision; however, NRC staff will endeavor to accommodate early completions by completing subsequent tasks early.

**Any Further Discussion or  
Questions from Staff?**

**From Licensee?**

Public Comment?