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July 23, 2008
L-08-221

10 CFR 50.90

ATTN: Document Control Desk
United States Nuclear Regulatory Commission
Washington, D. C. 20555-0001

SUBJECT:
Davis-Besse Nuclear Power Station, Unit 1
Docket No. 50-346, License No. NPF-3
Response to Request for Additional Information Related to Improved Technical Specifications Conversion, (TAC No. MD6398)

By letter dated August 3, 2007, as supplemented by letters dated May 16, 2008 (2 letters), the FirstEnergy Nuclear Operating Company (FENOC) submitted an application for license amendment. The proposed amendment would revise the Operating License and Technical Specifications for the Davis-Besse Nuclear Power Station (DBNPS) in order to convert from Current Technical Specifications (CTS) to Improved Technical Specifications (ITS).

By letter dated June 20, 2008, the Nuclear Regulatory Commission (NRC) staff requested additional information necessary to complete the amendment application review. The FENOC responses to the NRC staff's questions contained in the information request are attached.

In order to address the issues in the request for additional information, FENOC has made changes to the proposed Improved Technical Specifications. Details of the proposed changes were provided by FENOC on the NRC and DBNPS ITS Conversion Website. The associated question threads have been closed by the NRC after their review. The final changes will be included within the Revision 1 supplement for the affected ITS Volumes.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071.

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on

July 23, 2008.

Sincerely,

Barry S. Allen

Barry S. Allen

Attachment:
Response to Request for Additional Information Related to Improved Technical Specifications Conversion

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

Response to Request for Additional Information Related to Improved Technical Specifications Conversion

To complete their review, the NRC staff has requested additional information regarding the license amendment application for the conversion of Current Technical Specifications to Improved Technical Specifications. The staff request is provided below in bold type followed by the FENOC response for DBNPS.

A. Surveillance Requirement (SR) for Emergency Feedwater (EFW) System Steam Generator (SG) Control System

1. Please provide a basis that demonstrates how removal of the current SR 4.7.1.2.1.d from the Technical Specifications (TSs) would be in compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.36 (d)(3).

2. Please provide analyses to demonstrate that the EFW System would be operable without performing CTS SR 4.7.1.2.1.d.

It has been determined that CTS SR 4.7.1.2.1.d will not be removed from Technical Specifications. CTS SR 4.7.1.2.1.d will be retained in ITS 3.7.5, Emergency Feedwater (EFW). Proposed changes have been provided to the NRC by FENOC on the NRC and DBNPS ITS Conversion Website.

B. LCO for Remote Shutdown Control Circuits and Transfer Switches

1. Please provide a basis that demonstrates how removal of the CTS LCO 3.3.3.5.2 from the TSs would be in compliance with 10 CFR 50.36 (d)(2)(ii), Criterion 4.

It has been determined that CTS LCO 3.3.3.5.2 will not be removed from Technical Specifications. CTS LCO 3.3.3.5.2, and the associated actions and surveillance requirements will be retained in ITS 3.3.18, Remote Shutdown System. Proposed changes have been provided to the NRC by FENOC on the NRC and DBNPS ITS Conversion Website.