



FirstEnergy Nuclear Operating Company

5501 North State Route 2  
Oak Harbor, Ohio 43449

Barry S. Allen  
Vice President - Nuclear

419-321-7676  
Fax: 419-321-7582

August 7, 2008  
L-08-240

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  
Supplement to License Amendment Request: Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) – Volumes 1, 2, 3, 4, 8, 10, 12, 13, 14, and 16, TAC No. MD6398

By letter dated August 3, 2007, as supplemented by letters dated October 29, 2007, May 16, 2008 (2 letters) and July 23, 2008, the FirstEnergy Nuclear Operating Company (FENOC) submitted an application to amend the Technical Specifications of Davis-Besse Nuclear Power Station, Unit 1 (DBNPS), revising the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) consistent with the Improved Standard Technical Specifications (ISTS) as described in NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants," Revision 3.1, and certain generic changes to the NUREG.

This letter supplements the original license amendment request as a result of responses to U.S. Nuclear Regulatory Commission (NRC) questions on the NRC and FENOC Davis-Besse ITS Conversion Website. The guidance of Nuclear Energy Institute (NEI) 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996, and Nuclear Regulatory Commission (NRC) Administrative Letter 96-04, "Efficient Adoption of Improved Standard Technical Specifications," dated October 9, 1996, was used in preparing this supplement to the original ITS submittal. This letter supplements the following Attachment 1 Volumes:

- Volume 1 – Application of Selection Criteria to the Davis-Besse Nuclear Power Station Technical Specifications. Revision 1;
- Volume 2 – Generic Determination of No Significant Hazards Consideration and Environmental Assessment, Revision 1;
- Volume 3, Chapter 1.0 – Use and Application, Revision 1;
- Volume 4, Chapter 2.0 – Safety Limits, Revision 1;
- Volume 8, Section 3.3 – Instrumentation, Revision 1;

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Volume 10, Section 3.5 – Emergency Core Cooling Systems (ECCS), Revision 1;  
Volume 12, Section 3.7 – Plant Systems, Revision 1;  
Volume 13, Section 3.8 – Electrical Power Systems, Revision 1;  
Volume 14, Section 3.9 – Refueling Operations, Revision 1; and  
Volume 16, Chapter 5.0 – Administrative Controls, Revision 1.

Supplements for the remaining Volumes (Volumes 5, 6, 7, 9, 11, and 15) were provided by letter dated May 16, 2008.

Each Volume includes a Summary of Changes page at the beginning of the Volume. This Summary of Changes page identifies all changes made to the previous submittal (Revision 0), including a brief description of the change with the affected page numbers in the Revision 1 Volume. In addition, the affected Revision 1 pages have a revision bar to the right of the change to aid in identification.

Attachment 1 provides the detailed descriptions and justifications to support the proposed changes. FENOC has evaluated this proposed change in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c), and has concluded that the determination of no significant hazards considerations for the original ITS submittal remains valid. In addition, FENOC has determined that the proposed license amendment, including this supplement to the original ITS submittal, continues to meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(b), and no environmental impact statement or environmental assessment need be prepared in connection with the proposed license amendment. The specific determination of no significant hazards considerations and the generic determination of no significant hazards consideration and environmental assessment are included in Attachment 1.

The commitments are listed in Attachment 2. The attachment includes the previous commitments provided in the letters dated August 3, 2007 (commitments 1 and 2) and May 16, 2008 (commitment 3) and is included for your convenience. The new commitments contained in this letter (commitments 4 through 9) resulted from Davis-Besse responses to certain NRC questions on the NRC and FENOC Davis-Besse ITS Conversion Website. The commitments made and associated due dates are as follows:

Davis-Besse will maintain a 5% recharge margin for the life of the 125 VDC station batteries to ensure the 2 amp float current limit is conservative.	Upon implementation of the approved license amendment.
Davis-Besse will revise the 125 VDC station battery pilot cell selection criteria. The pilot cells will be selected to represent the lowest voltage cells in the battery. Cell temperature will be used as one of the criteria for selecting the pilot cells or a separate pilot cell will be selected to reflect average battery temperature. Pilot cell selection will be evaluated at a minimum of every two years (i.e., every 2 years or earlier).	Upon implementation of the approved license amendment.

<p>Davis-Besse will change the 125 VDC station battery pilot cell selection evaluation time specified in Commitment 5 above to be consistent with the requirements of Technical Specification Task Force (TSTF) – 500.</p>	<p>Six months after the NRC has approved TSTF-500.</p>
<p>Davis-Besse will include requirements for monitoring the following battery parameters and applicable acceptance criteria in the Battery Monitoring and Maintenance Program: visual inspection (i.e., for corrosion), cell-to-cell connection resistance, and specific gravity.</p>	<p>Upon implementation of the approved license amendment.</p>
<p>Davis-Besse will implement administrative controls specified in Specification 1.3, Example 1.3-3 (i.e., to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO).</p>	<p>Upon implementation of the approved license amendment.</p>
<p>Davis-Besse will revise calculations C-ICE-083.03-003 and C-ICE-083.03-004 such that the As-Found tolerance uses a drift value consistent with the Channel Functional Test Frequency.</p>	<p>Prior to implementation of the approved license amendment.</p>

In addition, one current License Condition is proposed to be deleted and two new License Conditions are proposed to be added to the Davis-Besse Facility Operating License.

License Condition 2.C(5), the secondary water chemistry monitoring program, is proposed to be deleted. As indicated in Volume 16, the requirements of this License Condition have been included in ITS 5.5.9, "Secondary Water Chemistry Program."

License Condition 2.C(9) is proposed to address the schedule for relocating certain CTS requirements to licensee-controlled documents, as approved by the NRC as follows:

"Relocation of Certain Technical Specification Requirements"

License Amendment No. XXX authorizes the relocation of certain Technical Specifications previously included in Appendix A to other licensee-controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in Table LA, Removed Detail Changes, and Table R, Relocated Specifications, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment."

License Condition 2.C(10) is proposed to address the schedule for implementing new and revised Surveillance Requirements, as approved by the NRC as follows:

"Schedule for New and Revised Surveillance Requirements (SRs)"

The schedule for performing SRs that are new or revised in Amendment No. XXX shall be as follows:

For SRs that are new in this amendment, the first performance is due at the end of the first Surveillance interval, which begins on the date of implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced Surveillance interval begins upon completion of the first Surveillance performed after implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended Surveillance interval begins upon completion of the last Surveillance performed prior to implementation of this amendment.

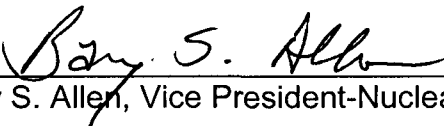
For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance subject to the modified acceptance criteria is due at the end of the first Surveillance interval that began on the date the Surveillance was last performed prior to the implementation of this amendment."

If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071.

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

Executed on August 7, 2008

Sincerely,

  
Barry S. Allen, Vice President-Nuclear

Davis-Besse Nuclear Power Station

L-08-240

Page 5 of 5

Attachments:

1. ITS Submittal, Volumes 1, 2, 3, 4, 8, 10, 12, 13, 14, and 16
2. Commitment List

cc: (all w/o Attachment 1)

NRC Region III Administrator

NRR Project Manager

NRC Resident Inspector

Executive Director, Ohio Emergency Management Agency,  
State of Ohio (NRC Liaison)

Utility Radiological Safety Board

Attachment 2  
L-08-240  
Regulatory Commitment List  
Page 1 of 3

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not Regulatory Commitments. Please notify Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071 of any questions regarding this document or associated Regulatory Commitments.

<u>Regulatory Commitment</u>	<u>Due Date</u>
<p>1. FENOC will notify the NRC when ITS implementation actions are completed.</p>	<p>Following implementation of the approved license amendment.</p>
<p>2. The following guidelines will be included in the assessment of systems removed from service during movement of irradiated fuel:</p> <ul style="list-style-type: none"> <li>- During fuel handling/core alterations, ventilation system and radiation monitor availability (as defined in NUMARC 91-06) should be assessed, with respect to filtration and monitoring of releases from the fuel. Following shutdown, radioactivity in the fuel decays away fairly rapidly. The basis of the Technical Specification operability amendment is the reduction in doses due to such decay. The goal of maintaining ventilation system and radiation monitor availability is to reduce doses even further below that provided by the natural decay.</li> <li>- A single normal or contingency method to promptly close primary or secondary containment penetrations should be developed. Such prompt methods need not completely block the penetration or be capable of resisting pressure. The purpose of the “prompt methods” mentioned above are to enable ventilation systems to draw the release from a postulated fuel handling accident in the proper direction such that it can be treated and monitored.</li> </ul> <p>[Reference NUREG-1430 Bases 3.9.3 Reviewer’s Note regarding the term “recently” associated with handling irradiated fuel, consistent with NUMARC 93-01, Revision 4, Section 11.3.6.5.]</p>	<p>Upon implementation of the approved license amendment.</p>

<p>3. Davis-Besse will ensure appropriate plant procedures and administrative controls will be used to implement the applicable Tier 2 Restrictions when LCO 3.0.8 is used. Specifically: a) at least one EFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s) must be available when LCO 3.0.8.a is used; b) at least one EFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling must be available when LCO 3.0.8.b is used; and c) every time the provisions of LCO 3.0.8 are used, Davis-Besse will confirm that at least one train of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the associated plant configuration shall be available on a recoverable basis for NRC staff inspection.</p>	<p>Upon implementation of the approved license amendment.</p>
<p>4. Davis-Besse will maintain a 5% recharge margin for the life of the 125 VDC station batteries to ensure the 2 amp float current limit is conservative.</p>	<p>Upon implementation of the approved license amendment.</p>
<p>5. Davis-Besse will revise the 125 VDC station battery pilot cell selection criteria. The pilot cells will be selected to represent the lowest voltage cells in the battery. Cell temperature will be used as one of the criteria for selecting the pilot cells or a separate pilot cell will be selected to reflect average battery temperature. Pilot cell selection will be evaluated at a minimum of every two years (i.e., every 2 years or earlier).</p>	<p>Upon implementation of the approved license amendment.</p>
<p>6. Davis-Besse will change the 125 VDC station battery pilot cell selection evaluation time specified in Commitment 5 above to be consistent with the requirements of Technical Specification Task Force (TSTF) – 500.</p>	<p>Six months after the NRC has approved TSTF-500.</p>

<p>7. Davis-Besse will include requirements for monitoring the following battery parameters and applicable acceptance criteria in the Battery Monitoring and Maintenance Program: visual inspection (i.e., for corrosion), cell-to-cell connection resistance, and specific gravity.</p>	<p>Upon implementation of the approved license amendment.</p>
<p>8. Davis-Besse will implement administrative controls specified in Specification 1.3, Example 1.3-3 (i.e., to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO).</p>	<p>Upon implementation of the approved license amendment.</p>
<p>9. Davis-Besse will revise calculations C-ICE-083.03-003 and C-ICE-083.03-004 such that the As-Found tolerance uses a drift value consistent with the Channel Functional Test Frequency.</p>	<p>Prior to implementation of the approved license amendment.</p>