

Barry S. Allen
Vice President - Nuclear

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

January 28, 2010

L-10-037

Mr. Mark A. Satorius, Administrator
United States Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

SUBJECT:

Davis-Besse Nuclear Power Station, Unit 1
Docket Number 50-346, License Number NPF-3
Response to Preliminary White Finding in Inspection Report 2009-503 for the
Davis-Besse Nuclear Power Station (EA-09-283)

This letter provides the FirstEnergy Nuclear Operating Company's (FENOC) response to a preliminary White Finding contained in Inspection Report 2009-503, dated December 28, 2009.

This special inspection, conducted on-site August 4 through 6, 2009, reviewed activities surrounding a June 25, 2009, Coupling Capacitor Potential Device (CCPD) failure in the switchyard at the Davis-Besse Nuclear Power Station (DBNPS). Specifically, this inspection was performed to review the event and FENOC's actions in response to the CCPD failure and subsequent transitory Alert declaration in accordance with the DBNPS Emergency Plan. The referenced Inspection Report discusses a preliminary White Finding (AV 05000346/ 2009503-01) that is categorized as having low to moderate safety significance in accordance with the Regulatory Oversight Process.

On January 6, 2010, FENOC notified Mr. Hironori Peterson of NRC Region III that FENOC would not be requesting a Regulatory Conference regarding the issues documented in the Inspection Report for the preliminary White Finding and does not contest the preliminary White Finding.

The event root cause evaluation and corrective actions are currently in management review. The DBNPS will notify the NRC when the root cause evaluation and corrective actions are ready for NRC follow-up inspection.

RECEIVED JAN 29 2010

Davis-Besse Nuclear Power Station, Unit 1
L-10-037
Page 2 of 2

FENOC does want to take this opportunity to respectfully request clarification of statements made in the Inspection Report regarding communications received by the Control Room. These statements are discussed further in the Attachment.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Dale R. Wuokko, Site Regulatory Compliance Manager, at (419) 321-7120.

Sincerely,


Barry S. Allen

JCS

Attachment: Response to a Preliminary White Finding in Inspection Report 2009-503

cc: NRC Document Control Desk
Chief, Operation Branch, NRC Region III
DB-1 NRC Senior Resident Inspector
DB-1 NRC/NRR Project Manager
Utility Radiological Safety Board

Davis-Besse Nuclear Power Station
Response to a Preliminary White Finding in Inspection Report 2009-503
Page 1 of 1

Clarifications to Davis-Besse Nuclear Power Station
Inspection Report (IR) 2009-503

1. The Inspection Report Sequence of Events (Enclosure 2, page 1) states, "At 00:50 hours, as documented in the FENOC site protection incident report and per interviews with the inspector, the SAS called to the Control Room and reported explosion and flames throughout the switchyard." This was not confirmed by the DBNPS root cause evaluation fact finding for this event captured in Condition Report (CR) 09-69475.

Contrary to the Inspection Report, the CR 09-69475 root cause evaluation Sequence of Activities states at "00:49:41 the Secondary Alarm Station (SAS) Operator contacts the Control Room Balance of Plant (BOP) Reactor Operator (RO) that "We have reports of flames out in the switchyard." Review of the SAS Operator recorded conversation with the Control Room BOP RO indicated he did not use the word explosion in the communication.

2. The Inspection Report Sequence of Events (Enclosure 2, page 1) states at 00:54 hours "Following the initial report to the Control Room by SAS, per the interview with the inspector, the Shift Security Supervisor indicated he communicated to the Shift Manager that the explosion was apparently from equipment malfunction and was not from suspicious activity."

Contrary to the Inspection Report, the CR 09-69475 analysis states that the Security Shift Supervisor called the Shift Manager to discuss the situation and they agreed that the event did not appear to be due to a Security issue. The conversation did not include the cause of the event, but rather focused on the current status. Review of the recorded conversation did not reveal the use of the word explosion in the communication.

Similar statements are also made in the body of the Inspection Report.

Clarification of the above Sequence of Events communications are considered important facts in determining the cause(s) of the event to develop the appropriate corrective actions. The CR 09-69475 root cause evaluation reviewed procedures, Condition Reports, training records, Security and Control Room phone/radio recordings, and interview results to determine facts, timeline, causal factors, root and contributing causes, and corrective actions.

This information will be made available for the NRC's follow-up inspection activities.