

August 16, 2012  
L-12-315

10 CFR 54

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:**

Davis-Besse Nuclear Power Station, Unit No. 1  
Docket No. 50-346, License Number NPF-3  
Supplemental Reply to Request for Additional Information for the Review of the  
Davis-Besse Nuclear Power Station, Unit No. 1, License Renewal Application  
(TAC No. ME4640) and License Renewal Application Amendment No. 32

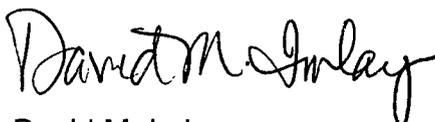
By letter dated August 27, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102450565), FirstEnergy Nuclear Operating Company (FENOC) submitted an application pursuant to Title 10 of the *Code of Federal Regulations*, Part 54 for renewal of Operating License NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse). During a telephone conference with the Nuclear Regulatory Commission (NRC) held on August 1, 2012, the NRC requested clarification regarding the response to NRC request for additional information (RAI) B.1.4-2 provided by FENOC letter dated March 9, 2012 (ML12094A383).

The Attachment provides the FENOC supplemental reply to NRC RAI B.1.4-2. The NRC request is shown in bold text followed by the FENOC response. The Enclosure provides Amendment No. 32 to the Davis-Besse LRA.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 16, 2012.

Sincerely,



David M. Imlay  
Director, Site Performance Improvement

A145  
NRR

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Attachment:

Reply to Requests for Additional Information for the Review of the Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse), License Renewal Application, Section B.1.4

Enclosure:

Amendment No. 32 to the Davis-Besse License Renewal Application

cc: NRC DLR Project Manager  
NRC Region III Administrator

cc: w/o Attachment or Enclosure  
NRC DLR Director  
NRR DORL Project Manager  
NRC Resident Inspector  
Utility Radiological Safety Board

Attachment  
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Reply to Requests for Additional Information for the Review of the  
Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse),  
License Renewal Application,  
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**Section B.1.4**

**Question RAI B.1.4-2 Supplement**

The Nuclear Regulatory Commission (NRC) initiated a telephone conference call with FirstEnergy Nuclear Operating Company (FENOC) on August 1, 2012, to discuss the FENOC response to RAI B.1.4-2 submitted by FENOC letter dated March 9, 2012 (ML12094A383), regarding the FENOC Operating Experience Program. The NRC requested clarification for RAI B.1.4-2 items (c), (d) and (l) from the March 9, 2012, letter as follows:

- (c) Will revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," be reviewed using the FENOC Operating Experience Program?
- (d) Does FENOC plan to include a specific identification code (i.e., a 'flag') for plant-specific operating experience in the Corrective Action Program?
- (l) The list of criteria used to make a decision on reporting plant-specific operating experience on age-related degradation to the industry does not include any mention of age-related degradation. What criteria regarding age-related degradation does FENOC plan to use for reporting purposes?

Additionally, NRC requested that FENOC review the Operating Experience Program write-up in License Renewal Application Appendix A, "Updated Safety Analysis Report Supplement," and provide the necessary changes based on responses to the three issues, above, discussed in the telephone conference.

**RESPONSE RAI B.1.4-2 SUPPLEMENT**

- (c) FENOC plans to review revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," using the FENOC Operating Experience Program.
- (d) Proposed changes to the FENOC Corrective Action Program and the Operating Experience Program databases include an "Aging" flag to identify plant-specific and industry operating experience concerning age-related degradation to structures and components within the scope of license renewal and managed by a license renewal aging management program.

- (I) Proposed changes to the Operating Experience Program include details for reporting plant specific operating experience concerning age-related degradation to the industry. The proposed criteria include events or issues related to aging management involving either of the following:
- Discovery of a previously unknown or unexpected aging effect or aging mechanism for the applicable material and environment combination.
  - Recommendation for a significant change in an aging management program (e.g., a significant change to monitoring or inspection frequency or technique, or to preventive actions).

License Renewal Application Appendix A, "Updated Safety Analysis Report Supplement," is revised to include changes based on the supplemental responses to RAI B.1.4-2 items (c), (d) and (I), above.

See the Enclosure to this letter for the revision to the Davis-Besse LRA.

## **Enclosure A**

**Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse)**

**Letter L-12-315**

**Amendment No. 32 to the  
Davis-Besse License Renewal Application**

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**License Renewal Application  
Section Affected**

Section A.1

The Enclosure identifies the change to the License Renewal Application (LRA) by Affected LRA Section, LRA Page No., and Affected Paragraph and Sentence. The count for the affected paragraph, sentence, bullet, etc. starts at the beginning of the affected Section or at the top of the affected page, as appropriate. Below each section the reason for the change is identified, and the sentence affected is printed in *italics* with deleted text ~~*lined-out*~~ and added text *underlined*.

<u>Affected LRA Section</u>	<u>LRA Page No.</u>	<u>Affected Paragraph and Sentence</u>
A.1	Page A-9	2 <sup>nd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> and 8 <sup>th</sup> bulleted items

In response to RAI B.1.4-2 Supplement, LRA Section A.1, "Summary Descriptions of Aging Management Programs and Activities," previously revised by FENOC letter dated July 11, 2012 (ML12198A019), is revised to read as follows:

### **Operating Experience**

Operating experience from plant-specific and industry sources is captured and systematically reviewed on an ongoing basis in accordance with the quality assurance program, which meets the requirements of 10 CFR Part 50, Appendix B, and the operating experience program, which meets the requirements of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff." The operating experience program interfaces with and relies on active participation in the Institute of Nuclear Power Operations' operating experience program, as endorsed by the NRC. The FENOC Operating Experience Program processes and procedures for the ongoing review of operating experience include the following attributes:

- Training on age-related degradation and aging management is provided to those personnel responsible for implementing aging management programs and who may submit, screen, assign, evaluate, or otherwise process plant-specific and industry operating experience to ensure they are qualified for the task. This training is to occur on the frequency determined by FENOC training procedures and processes, and includes provisions to accommodate the turnover of plant personnel.
- *While the programs and procedures may specify reviews of certain sources of information, such as NRC generic communications, revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," and Institute of Nuclear Power Operations reports, they allow for any potential source of relevant plant-specific or industry operating experience information.*
- The processes are adequate so as to not preclude the consideration of operating experience related to aging management. The processes allow for appropriately gathering information on structures and passive components within the scope of license renewal, their materials,

environments, aging effects, and aging mechanisms, and the aging management programs credited for managing the effects of aging, including the activities under these programs (e.g., inspection methods, preventive actions or evaluation techniques).

- Plant-specific operating experience, including aging-related operating experience, is documented in condition reports and processed using the FENOC Corrective Action Program. The Corrective Action Program database includes an "Aging" flag to identify plant-specific operating experience concerning age-related degradation to structures and components within the scope of license renewal and managed by a license renewal aging management program. Condition reports for adverse conditions and related documents captured in the Corrective Action Program database are quality records and are auditable and retrievable.
- Industry operating experience, including aging-related operating experience, is entered into the Operating Experience Program database and screened for applicability to FENOC. The Operating Experience Program database includes an "Aging" flag to identify plant-specific and industry operating experience concerning age-related degradation to structures and components within the scope of license renewal and managed by a license renewal aging management program. Documents captured in the Operating Experience Program database are retrievable.
- Evaluations of internal and external aging-related operating experience issues associated with structures and passive components include consideration of the affected structure or component, material, environment, aging effect, aging mechanism, and aging management program, with feedback to the affected aging management program owner for consideration of the impact to aging management program effectiveness.
- Aging management program owners review data collected by program activities, use the Corrective Action Program to document adverse conditions to ensure they will be addressed and corrected, maintain required records for the program, maintain the program current, and implement revisions as needed based on program results and internal or external operating experience evaluations. Revision of existing or development of new aging management programs based on operating experience evaluations is performed through corrective actions using the Corrective Action Program, or by action items identified in the Operating Experience Program database.

- Noteworthy plant-specific aging-related operating experience is shared with the other FENOC sites and the industry. *The Operating Experience Program procedure provides guidance on sharing internal operating experience, using evaluation criteria for events or issues related to aging management such as:*
  - *Discovery of a previously unknown or unexpected aging effect or aging mechanism for the applicable material and environment combination; or,*
  - *Recommendation for a significant change in an aging management program (e.g., a significant change to monitoring or inspection frequency or technique, or to preventive actions).*