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October 30, 2018
L-18-235

10 CFR 50.54(f)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

SUBJECT:
Davis-Besse Nuclear Power Station
Docket No. 50-346, License No. NPF-3
Request for Deferral of Actions Related to Beyond-Design-Basis External Events
Flooding Actions (CAC No. MF3721)

By this letter, FirstEnergy Nuclear Operating Company (FENOC) requests deferral of actions related to beyond-design-basis external events (BDBEE) flooding actions for Davis-Besse Nuclear Power Station (DBNPS).

By letter dated April 25, 2018 (Accession No. ML18115A007), FENOC provided notification to the Nuclear Regulatory Commission (NRC) that DBNPS would cease power operations in 2020. In light of the decision to permanently shut down and defuel, activities planned between now and the 2020 shutdown were reviewed. One of the activities scheduled during this period was the support of NRC staff review of the DBNPS focused evaluation (FE) for flooding that was submitted to meet the evaluation request documented in NRC letter dated September 1, 2015, "Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for Beyond-Design-Basis External Events" (Accession No. ML15174A257).

FENOC provided the FE results for DBNPS by letter dated July 11, 2017 (Accession No. ML17192A069). This information is currently under review by NRC staff. FENOC no longer considers the continuance of the NRC staff review of the FE to be necessary given the results that unbounded reevaluated flood mechanisms previously submitted in the flood hazard reevaluation report, local intense precipitation (LIP) flood, and probable maximum storm surge (PMSS) flooding, do not impact key structures, systems, or components (SSCs) or challenge key safety functions at DBNPS.

FENOC has performed and submitted the DBNPS mitigating strategies assessment (MSA) using the beyond-design-basis reevaluated flood hazards. The NRC has reviewed the MSA (Accession No. ML17086A499) and concluded that the DBNPS MSA was performed consistent with the guidance described in Appendix G of Nuclear Energy Institute (NEI) 12-06, Revision 2, and that the licensee has demonstrated that the mitigation strategies, if appropriately implemented, are reasonably protected from reevaluated flood hazards conditions for beyond-design-basis external events.

The DBNPS MSA for flood hazards identified that LIP and PMSS events challenged implementation of FLEX strategies in the Phase 3 strategy staging areas and the FLEX "N+1" equipment deployment path. For LIP, flooding levels develop for a depth above critical door sills for a period of 0.5 hours. Waves and runup at the flooded locations are minimal, and therefore can be neglected. For PMSS, flooding levels impact critical station doors above elevation 585 feet for a period of 2.5 hours. As a result, alternate staging areas were identified, and trigger points were developed that allow "N+1" equipment deployment prior to flooding of the deployment path. The FLEX final integrated plan (NORM-LP-7203) and applicable emergency plan off-normal occurrence procedures (RA-EP-02810, "Tornado or High Winds," and RA-EP-02830, "Flooding") were updated to incorporate the established trigger points. Receiving a flood alert or high wind flood alert, as defined in the procedures, requires the site to take immediate action to ensure that the FLEX "N+1" equipment is relocated within two hours of receipt of the notification, providing adequate time for equipment to be staged prior to flooding of the deployment path.

As indicated in the results of the DBNPS FE, additional flooding analyses were performed to improve realism of the evaluated storm. Following Path 2 of NEI 16-05, Revision 1, site-specific analysis for a LIP event removed flooding from critical doors that lead directly to key SSCs. Non-critical doors that see minimal flooding are not designated as flood protection features. Following Path 1 of NEI 16-05, Revision 1, refined analysis for a PMSS event removed all flooding in the power block area. Therefore, no safety-related structures are subject to flooding from a PMSS or LIP event. Based on these results, the current FLEX mitigating strategies provide reasonable protection from reevaluated flood hazards for BDBEE, and an integrated assessment is not needed.

Considering the FE results, time required for NRC review and determination if additional information or action is needed, and time for the plant to evaluate, provide, and implement any actions, there is insufficient time for the FE review effort to result in any appreciable safety benefit. With the decision to permanently shut down and defuel DBNPS, flooding activities being performed to meet the NRC 10 CFR 50.54(f) request for information (Accession No. ML12053A340) and any related support actions planned between now and the 2020 cessation of power operations, including further NRC staff review of the FE, are requested to be deferred.

Davis-Besse Nuclear Power Station

L-18-235

Page 3

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager, FENOC Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 30, 2018.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark B. Bezilla', written in a cursive style.

Mark B. Bezilla

cc: Director, Office of Nuclear Reactor Regulation (NRR)
NRC Region III Administrator
NRC Resident Inspector
NRR Project Manager
Utility Radiological Safety Board