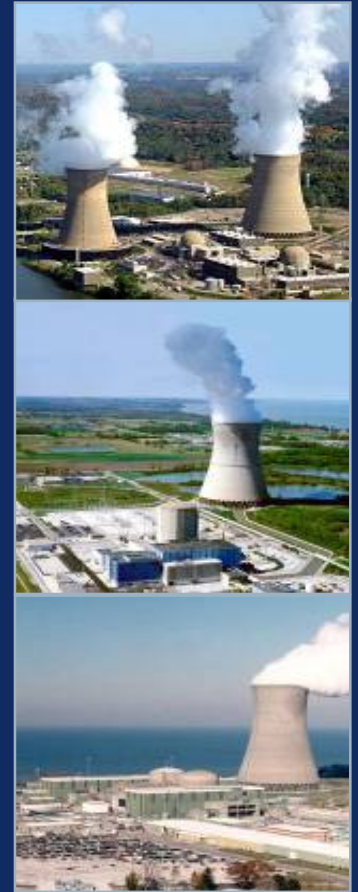




Davis-Besse Nuclear Power Station (DB) Post-Shutdown Emergency Plan (PSEP) License Amendment Request

Pre-Submittal Meeting
Davis-Besse Nuclear Power Station
November 8, 2018



Post-Shutdown Emergency Plan License Amendment Request

■ Introductions:

- Tom Lentz, Manager, FENOC Fleet Licensing
- Sean Zalesny, Manager, FENOC Fleet Emergency Planning
- Pat McCloskey, Manager, DB Regulatory Compliance
- Todd Kildoo, FENOC Fleet Emergency Planning
- Kathy Nesser, FENOC Fleet Licensing
- Jim Emley, FENOC Fleet Licensing
- David Daigle, ENERCON

Post-Shutdown Emergency Plan License Amendment Request

■ Agenda

- License Amendment Request
- Need for Change
- Regulatory Bases
- Technical Justification
- Summary
- Open Discussion

Post-Shutdown Emergency License Amendment Request

■ License Amendment Request

- Submittal Date
 - Targeting December 2018
- Submittal Contents
 - License Amendment Request
 - Summary Table of Proposed Changes (with explanation)
 - Emergency Plan - Markup
 - Emergency Plan - Clean Version
 - Augmented ERO Task Analysis

Post-Shutdown Emergency License Amendment Request

■ Need for Change

- On April 25, 2018 FENOC announced the permanent shutdown of DB will be by May 31, 2020.
- Upon docketing of the certifications for permanent cessation of operations, DB will no longer be authorized to operate the reactor or place or retain fuel in the reactor vessel.
- As a result, there is a reduction in hazards associated with the permanently defueled condition.
- With respect to the emergency plan, this allows the facility staff to transition from an operating facility to a permanently defueled facility.

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■ Regulatory Bases

- 10 CFR 50.82(a)(i) and (ii) and 10 CFR 50.82(a)(2)
 - Notifications of permanent shutdown and fuel removal, which results in no longer being able to operate the facility.
- 10 CFR 50.47 and 10 CFR 50, Appendix E
 - Provides the requirements for onsite emergency organization to respond to emergency events.
 - These requirements are still applicable during this period.
- 10 CFR 50.54(q)
 - Provides the guidance for evaluating Emergency Plan changes.
 - If there is a “reduction in effectiveness,” then a License Amendment Request is required to request NRC approval.

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■ Regulatory Bases (continued)

- NUREG-0654
 - Specifies the on-site emergency organization of plant staff personnel.
 - These requirements are still applicable during this period.
- NSIR/DPR-ISG-01
 - Provides information relevant to performing an on-shift staffing analysis. The ISG states that NEI 10-05 is an acceptable methodology for performing the staffing analysis.
 - The staffing analysis provides the basis for staffing changes associated with the reduction in hazards associated with the permanently defueled condition.

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■ Technical Justification

- The reduction in hazards due to the permanently shutdown and defueled condition was identified. The hazards evaluated are:
 - Waste Gas Decay Tank Rupture
 - Design Basis Threat
 - Fuel Handling Accident (FHA) with General Emergency and Protective Action Recommendation
 - Probable Aircraft Threat [10 CFR 50.54(hh)]
 - Fire Requiring Evacuation of the Control Room and Control of SFP Cooling
- The staffing analysis and the task analysis provides the basis for staffing changes associated with the reduction in hazards.

Post-Shutdown Emergency Plan License Amendment Request

■ Technical Justification (continued)

- Results of the analyses indicated that a reduction in both the on-shift and augmented ERO is appropriate.
- Supporting submittals
 - Certified Fuel Handler (CFH) Training Program submitted on August 15, 2018.
 - Technical Specifications (TS), Sections 1 and 5, License Amendment Request (LAR) submitted on October 22, 2018.
- Precedence
 - Vermont Yankee
 - Fort Calhoun
 - Oyster Creek

Post-Shutdown Emergency Plan License Amendment Request

■ Summary

- The PSEP LAR is based on a reduction in hazards associated with the permanently defueled condition.
- A on-shift staffing analysis and a functional analysis of the augmented ERO staff support the changes in the ERO staffing.
- The requirements of 10 CFR 50.47 and 10 CFR 50, Appendix E remain satisfied.



Open Discussion

