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February 27, 2019
L-19-062

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10 CFR 50.90

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 No. NPF-3
Supplement to License Amendment Request – Proposed Changes to Technical Specifications Sections 1.1, “Definitions,” and 5.0, “Administrative Controls,” for Permanently Defueled Condition (EPID No. L-2018-LLA-0287)

By letter dated October 22, 2018 (Accession No. ML18295A289), FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request (LAR) for Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS). The LAR proposed changes to the organization, staffing, and training requirements contained in Section 5.0, “Administrative Controls” of the DBNPS Technical Specifications (TS) and defined two new positions for Certified Fuel Handler and Non-Certified Operator in Section 1.1, “Definitions,” to support the transition of DBNPS to a permanently defueled condition.

On February 13, 2019, the Nuclear Regulatory Commission (NRC) Project Manager identified several recommended changes in the proposed TS pages. The definition of a certified fuel handler should include “the” prior to “provisions,” and TS 5.2.2 use of semi-colons and periods should be consistent. Based on this feedback, FENOC is providing this supplement to the LAR to incorporate these changes.

Enclosed is the supplemental information in support of the amendment request. The enclosure contains pages of the LAR affected by the changes (Page 3 of 22 and Page 6 of 22) and TS page markups for TS pages 1.1-1, 5.2-1, and 5.2-2. These pages supersede the previously provided pages.

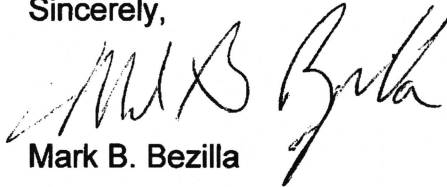
FENOC has reviewed the previously provided conclusion that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92, “Issuance of amendment.” The information provided in this supplement does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration.

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There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Mr. Thomas Lentz, Manager, FENOC Nuclear Licensing & Regulatory Affairs, at (330) 315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2019.

Sincerely,



Mark B. Bezilla

Enclosure:
Supplement to License Amendment Request Evaluation of Proposed Changes

cc: NRC Region III Administrator
NRC Resident Inspector
NRR Project Manager
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Enclosure

Supplement to License Amendment Request Evaluation of Proposed Changes
(6 pages follow)

This LAR provides a discussion and description of the proposed TS changes, a technical evaluation of the proposed TS changes, and information supporting a finding of no significant hazards consideration (NSHC).

2.0 DETAILED DESCRIPTION

Attachment 1 contains a markup of the current TS pages. The specific changes affecting TS Sections 1.1 and 5.0 are described in this section; the supporting technical evaluation is presented in Section 3.0 of this enclosure. Proposed revisions in this section are shown in ***Bold-Italics*** and deletions are shown using ~~strikethrough~~. All revised formatting, numbering, and wording in TS Section 5.0 is consistent with Section 5.0 of Reference 3, except where noted to make the specification germane with a permanently defueled reactor.

TS Section 1.1 – Definitions	
Current TS	Proposed TS
[A term and definition for CERTIFIED FUEL HANDLER is not listed in the current TS.]	<p><u>Term</u></p> <p><i>CERTIFIED FUEL HANDLER</i></p> <p><u>Definition</u></p> <p><i>A CERTIFIED FUEL HANDLER is an individual who complies with the provisions of the CERTIFIED FUEL HANDLER training and retraining program required by Specification 5.3.2.</i></p>
[A term and definition for NON-CERTIFIED OPERATOR is not listed in the current TS.]	<p><u>Term</u></p> <p><i>NON-CERTIFIED OPERATOR</i></p> <p><u>Definition</u></p> <p><i>A NON-CERTIFIED OPERATOR is a non-licensed operator who complies with the qualification requirements of Specification 5.3.1, but is not a CERTIFIED FUEL HANDLER.</i></p>

TS Section 5.2 – Organization	
Current TS	Proposed TS
<p>Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements;</p> <p>c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position;</p> <p>d. Deleted;</p> <p>e. The operations manager shall either hold or have held a Senior Operator license. The assistant operations manager shall hold a Senior Operator license for the Davis-Besse Nuclear Power Station; and</p> <p>f. When the reactor is operating in MODE 1, 2, 3, or 4 an individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.</p>	<p>HANDLER;</p> <p>b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements and the following conditions are met:</p> <ol style="list-style-type: none"> 1) No nuclear fuel movements are in progress; 2) No movement of loads over nuclear fuel is in progress; and 3) No unmanned shift positions during shift turnover shall be permitted due to an incoming shift crew member being late or absent; <p>c. A radiation protection technician shall be on site when fuel is in the reactor during movement of nuclear fuel and during the movement of loads over nuclear fuel. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position;</p> <p>d. Deleted At least one person qualified to stand watch in the control room (NON-CERTIFIED OPERATOR or CERTIFIED FUEL HANDLER) shall be present in the control room when nuclear fuel is stored in the spent fuel pool;</p> <p>e. The operations manager shall either hold or have held a Senior Operator license. shift manager be a CERTIFIED FUEL HANDLER The assistant operations manager shall hold a Senior Operator license for the Davis-Besse Nuclear Power Station; and</p> <p>f. When the reactor is operating in MODE 1, 2, 3, or 4 an individual shall provide</p>

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ALLOWABLE THERMAL POWER	ALLOWABLE THERMAL POWER shall be the maximum reactor core heat transfer rate to the reactor coolant permitted by consideration of the number and configuration of reactor coolant pumps (RCPs) in operation.
AXIAL POWER IMBALANCE	AXIAL POWER IMBALANCE shall be the power in the top half of the core, expressed as a percentage of RATED THERMAL POWER (RTP), minus the power in the bottom half of the core, expressed as a percentage of RTP.
AXIAL POWER SHAPING RODS (APSRs)	APSRs shall be control components used to control the axial power distribution of the reactor core. The APSRs are positioned manually by the operator and are not trippable.
<u>CERTIFIED FUEL HANDLER</u>	<u>A CERTIFIED FUEL HANDLER is an individual who complies with the provisions of the CERTIFIED FUEL HANDLER training and retraining program required by Specification 5.3.2.</u>
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for ~~unit operation~~facility staff and corporate management, ~~respectively~~. The onsite and offsite organizations shall include the positions for activities affecting ~~safety of the nuclear power plant~~the safe storage and handling of nuclear fuel.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all ~~operating~~facility organization positions. These relationships shall be documented and updated, as appropriate, in organization ~~charts~~descriptions, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR.
- b. The plant manager shall be responsible for overall safe operation of the ~~plant~~facility and shall have control over those onsite activities necessary for safe ~~operation and maintenance~~storage and maintenance of the ~~plant~~nuclear fuel.
- c. A specified corporate officer shall have corporate responsibility for ~~overall plant nuclear safety~~the safe storage and handling of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the ~~plant~~facility to ensure ~~nuclear safety~~safe management of nuclear fuel.
- d. The individuals who train the ~~operating staff~~CERTIFIED FUEL HANDLERS, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their ~~independence from operating pressures~~ability to perform their assigned functions.

5.2.2 Unit/Facility Staff

The ~~unit~~facility staff organization shall include the following:

- a. ~~A non-licensed operator shall be assigned if the reactor contains fuel and an additional non-licensed operator shall be assigned if the reactor is operating in MODES 1, 2, 3, or 4; Each on duty shift shall be composed of at least one shift manager and one NON-CERTIFIED OPERATOR. The NON-CERTIFIED OPERATOR position may be filled by a CERTIFIED FUEL HANDLER;~~

- b. Shift crew composition may be less than the minimum requirement of ~~10 CFR 50.54(m)(2)(i) and~~ Specifications 5.2.2.a ~~and 5.2.2.f~~ for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements; and the following conditions are met:
- 1) No nuclear fuel movements are in progress;
 - 2) No movement of loads over nuclear fuel is in progress; and
 - 3) No unmanned shift positions during shift turnover shall be permitted due to an incoming shift crew member being late or absent;

5.2 Organization

5.2.2 Unit/Facility Staff (continued)

- c. A radiation protection technician shall be on site ~~when fuel is in the reactor~~during movement of nuclear fuel and during the movement of loads over the nuclear fuel. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position;
 - d. ~~Deleted~~At least one person qualified to stand watch in the control room (NON-CERTIFIED OPERATOR or CERTIFIED FUEL HANDLER) shall be present in the control room when nuclear fuel is stored in the spent fuel pool;
 - e. ~~The operations manager/shift manager shall either hold or have held a Senior Operator license.~~be a CERTIFIED FUEL HANDLER. ~~The assistant operations manager shall hold a Senior Operator license for the Davis-Besse Nuclear Power Station; and~~
 - f. ~~When the reactor is operating in MODE 1, 2, 3, or 4 an individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.~~Oversight of nuclear fuel handling operations shall be provided by a CERTIFIED FUEL HANDLER.
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