

Docket Nos. 50-500
50-501

Serial No. 2-142

March 13, 1979



LOWELL E. ROE
Vice President
Facilities Development
(419) 259-5242

Attn: Mr. Roger S. Boyd
Director of Nuclear Reactor Regulations
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Davis-Besse Nuclear Power Station Units No. 2 and 3
Anticipated Transients Without Scram (ATWS)

References: (a) NUREG-0460, Volume 3, December 1978
(b) Your letter to L. E. Roe, (Toledo Edison Co.) dated
February 8, 1979

Dear Mr. Boyd:

Toledo Edison Company has reviewed reference (b) with our NSSS supplier, Babcock and Wilcox Company, and our A/E, Bechtel Power Corporation. Based upon our current understanding of the USNRC's request, it is our position that any design and component fabrication for the Davis-Besse Nuclear Power Station Units No. 2 and 3 (DB-2&3) scheduled to occur between now and November 1, 1979 can proceed without precluding the addition of or affecting a reactor backup scram system, increased reactor coolant system pressure relief capacity and demonstration of functionality of long-term cooldown valves as outlined in references (a) and (b).

However, it should be noted that the final detailed requirements of the NRC are not known at this time, but are projected to be established by November 1, 1979 (reference (a)). When these regulatory requirements have been finally established, Toledo Edison Company will determine what, if any, design modifications will be made for DB-2&3.

Should the NRC increase its requirements for the mitigation of ATWS beyond these specified in reference (b) above, or should the NRC final rule/regulations on ATWS be issued after November 1, 1979, Toledo Edison Company cannot assure that the design and component fabrication for DB-2&3 would be such so as not to preclude their addition.

Yours very truly,

A handwritten signature in cursive script that reads 'Lowell E. Roe / eor'.

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ADD:
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