NRC FORM 195 (2-76) U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER: 50-346

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TO:	FROM:	DATE OF DOCUMENT
Mr. John F. Stolz	Toledo Edison Company Toledo, Ohio Mr. Lowell E. Roe	2/8/77
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DESCRIPTION

Ltr. w/attached...re our 1/25/77 ltr. and their 12/19/75 ltr...their comments on proposed tech specs regarding imposition of excessive surveillance requirements or requirement of excessive redundancy thereby increasing operating expenses and reducing availability with no corresponding improvment in safety margins.....

ENCLOSURE

ACKNOWLEDGED
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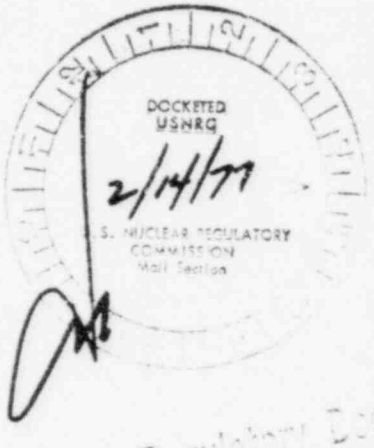
TOLEDO EDISON

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

Docket No. 50-346

February 8, 1977

Serial No. 211



Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Light Water Reactors Branch No. 1
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Regulatory Docket File

Dear Mr. Stolz:

As requested in your letter dated January 25, 1977, which transmitted the proposed Standard Technical Specifications for Davis-Besse, Unit 1, our comments are attached. The comments address areas where the Technical Specifications impose excessive surveillance requirements or require excessive redundancy thereby increasing operating expenses and reducing availability with no corresponding improvement in safety margins. These comments do not include the clarifications and information exchanges discussed in recent telephone conversations between the Applicant and your staff which have resulted in some corrections to the "Draft" Technical Specifications. Many of the attached comments have already been identified in our letter to Mr. A. Schwencer dated December 19, 1975. Despite repeated promises over the last year by the Licensing Project Manager for Davis-Besse Unit 1, we have not yet received a written response to those concerns, nor have we received NRC minutes of meetings held on January 29, 1976 and September 9, 1976, again despite numerous promises that they would be issued to the Applicant. Resolution of the attached comments is requested in a much more timely manner to allow for incorporation of these comments in the short time remaining prior to issuance of the Operating License.

1545

While staff members have repeatedly indicated that other Applicants have accepted technical specification content which we have taken exception to, we find from discussions with other utilities that they have shared many of our concerns, but eventually found themselves in positions which no longer made it prudent to continue dialog with the staff at the expense of obtaining Operating Licenses. Toledo Edison would be happy to further discuss our viewpoints with appropriate NRC management regarding the staff technical specification development process as experienced by us on the Davis-Besse facility. Perhaps such discussion would be of value in developing technical specifications for future facilities.

Yours very truly,

Donald C. Cox

Attachments:
Davis-Besse Unit 1 Technical Specification Comments (February 7, 1977)

cp a/2-3

cc:
R. S. Boyd, Director
Division of Project Management

Davis-Besse Unit 1 Technical Specifications Comments
(February 7, 1977)

A. Of the eight areas of comment identified in the December 19, 1975 letter to Mr. A. Schwencer the comments on the following areas are still valid:

1. The Reactor Protection System is designed to meet the 1971 version of IEEE 279.

2. Offsite AC sources and the requirement for two immediate sources rather than the one immediate and one delayed source for which the unit was designed.

3. Inadequate time for action.

4. Definition of modes of operation.

5. Primary coolant specific activity sample and analysis program.

6. Refueling operation instrumentation.

7. Code safety valves.

Item 8 was concerned with surveillance frequencies which are now being addressed separately as our compliance with Section XI of the ASME Boiler and Pressure Vessel Code.

B. The following additional comment has developed since the December 19, 1975 letter:

1. Technical Specifications 2.2.1 and 3.4.1 require that the Reactor Protection System High Flux Trip Set Point be reset for 3 and 2 pump operation. This function is already provided by the High Flux/Number of Reactor Coolant Pumps on Trip Set Points and the Flux/Δ Flux/Flow Trip Set Points. The safety analyses never took credit for resetting the High Flux Trip Set Points for 3 and 2 pump operation. Hence, the reset of the High Flux Trip Set Point should not be required.

db a/16