

Docket No. 50-346

License No. NPF-3

Serial No. 415

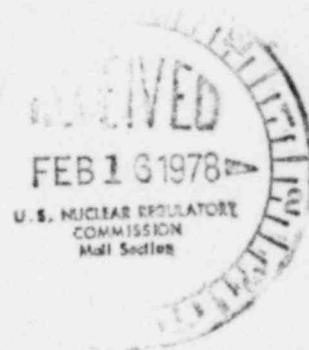
February 13, 1978

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

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Director of Nuclear Reactor Regulation
Attention: Mr. Richard C. DeYoung
Deputy Director
Division of Project Management
United States Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. DeYoung:

Members of my staff met with your Davis-Besse Unit 1 Project Manager and other NRR staff members on February 7, 1978, concerning the need for and requirements of a natural circulation test prior to completion of the test program for the Davis-Besse Unit 1. During this meeting, we stressed again that our evaluation of this subject shows that a natural circulation test is not required, based on the prototype testing done on the Oconee No. 1 Unit. The Davis-Besse unit has the raised loop configuration which differs from the Oconee configuration, but this change adds approximately 17% effective driving head for natural circulation. This provides additional conservatism which is supported by B&W analysis.

During the February 7, 1978 meeting, we presented data from a reactor trip event on November 29, 1977, which we had previously anticipated would be adequate to fulfill the natural circulation test data requirements. This data, however, is limited and does not fully meet the requirements of the test procedure, but it does confirm natural circulation in the primary system during the 15-minute interval that the primary pumps were not in service.

We currently have OI&E concurrence to proceed from the existing power level of 75% full power to 90% full power. Approval for further escalation to 100% full power is contingent upon resolution of the natural circulation test requirements with NRR.

Our Company and this area of the United States is facing a severe shortage of coal due to the current coal miners' strike. Due to this reason, it is imperative that the maximum utilization of nuclear power generation be realized to conserve the remaining low coal reserves at the coal-fired stations.

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Mr. Richard C. DeYoung

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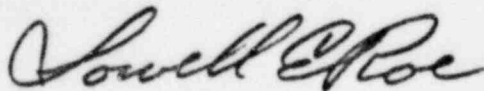
Accordingly, it is our desire to increase the power level of the Davis-Besse Unit 1 to 100% full power as soon as possible after the 90% plateau steady state testing is complete. Our current schedule is to increase to 90% on Tuesday, February 14, 1978, and complete the steady state testing on Thursday, February 16, 1978.

We request that the requirements to conduct a natural circulation test be reconsidered and that we be relieved of this requirement. If, however, your reevaluation would show that a test is desirable, we request your approval to proceed to 100% power level and conduct the test at the first opportunity after the current coal crisis is alleviated.

We feel that this is fully justified since our evaluation, supported by B&W, shows that the Davis-Besse Unit 1 configuration is more conservative than the Oconee configuration which was proven by prototype natural circulation test.

This action would impose no risk on the health and safety of the public and will help to mitigate an existing shortage of coal supplies, which, if it continues, could result in serious consequences regarding the public health and safety.

Yours very truly,



Lowell E. Roe
Vice President
Facilities Development

LER.r

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