

JAN 26 1973

Docket No. 50-346

R. C. DeYoung, Assistant Director for Pressurized Water Reactors, L
THRU: A. Schwencer, Chief, Pressurized Water Reactors Branch No. 4, L

RECOMMENDATION ON THE PRELIMINARY REVIEW OF THE DAVIS-BESSE NUCLEAR
POWER STATION UNIT 1, TOLEDO EDISON COMPANY

SUMMARY

The preliminary review of the operating license application for the Davis-Besse Nuclear Power Station has been completed. It is recommended that the Davis-Besse application be rejected based upon deficiencies in the Site Safety portion of the FSAR.

INTRODUCTION

On December 12, 1972, Toledo Edison Company tendered the Davis-Besse Nuclear Power Station operating license application for a preliminary review. The FSAR submitted with this application is based on the "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants" of February 1972. The facility will utilize a Babcock and Wilcox pressurized water reactor for the nuclear steam supply system. The station site is located on the southwestern shore of Lake Erie, in Ottawa County, Ohio.

In accordance with "A Guide for the Preliminary Review of Facility License Applications," review participants were provided instructions, a review schedule was promulgated, and a meeting with the Technical Review participants was held on December 20, 1972. Evaluation reports from Technical Review were submitted to the Project Manager on or about January 3, 1973.

The Project Licensing Assistant reviewed the general information submitted with the application and found it to be substantially complete. We were notified by the Office of Anti-trust and Indemnity that additional anti-trust data is not required from the applicant at this time because the AEC position with respect to anti-trust has not been formulated yet. The applicant stated that the Environmental Report-Construction Permit Stage, as previously amended and supplemented, reflects all environmental considerations of anticipated operation of the station. Therefore, this material constitutes the Environmental Report-Operating License Stage.

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DISCUSSION

Completeness of the Davis-Besse application was assessed using the February 1972 edition of the Standard Format because of the short duration between the availability of Revision 1 to the Standard Format, November 22, 1972, and receipt of the tendered application, December 12, 1972. Our memorandum to Technical Review initiating the review stated that the application was prepared in accordance with and should be judged for completeness on the basis of the February 1972 edition.

Review of the Technical Review evaluation reports and discussions with the Technical Review participants have assured us that all sections of the FSAR were reviewed for completeness. Except for Site Safety, all Technical Review branches found the FSAR material for which they are responsible to be acceptable for docketing and scheduling. Estimates of completeness range from a low of 85% to a high of 97% as determined from the evaluation reports. It is my own estimate that in total these sections of the FSAR are over 90% complete.

The Office of Site Safety does not consider the FSAR to be sufficiently complete for acceptance. They stated that the principal inadequacies and the basis for rejection were in the areas of radiological dose mitigation design and hydrologic engineering. It was further stated that in some instances their deficiency comments were provided in accordance with Revision 1 of the Standard Format. As such these comments represent new information requirements to the applicant.

In Chapter 15 of the FSAR, credit is taken for iodine reduction as the result of a boric acid additive in the containment spray system. However, there is no discussion in the FSAR of the engineering safety feature aspects of this system or the analytic procedures and calculational results to support the specific dose reduction factors used. This area is clearly a deficiency in light of the Standard Format.

The hydrologic engineering deficiencies are less obvious. In a number of cases the hydrology staff agrees that the deficient material is not specifically enumerated in the Standard Format, but it is their opinion that this information is covered by more generally stated requirements. Numerous comments which were supplied deal with a seiche event which occurred in the general region of the plant in late fall, October or November 1972. Three other comments deal with site drainage especially the drainage from the roofs of safety related structures. At least the roof aspect of these comments represents new information.

Having reviewed the material of this section in some detail and having discussed this matter with the hydrology staff it is my impression that the hydrology staff really desires coverage broader in scope and in some cases greater in depth than is stated in the Standard Format. If this is the case, it would seem appropriate to revise the Standard Format to reflect the degree of coverage of material which they desire.

Environmental Projects found the Environmental Report-Operating License Stage acceptable. Section 16 does not contain any nonradiological environmental technical specifications and the applicant will be notified that such environmental technical specifications will be required prior to the issuance of an operating license.

In addition to these areas, a number of comments were received from the other Technical Review branches. It is recognized that new information such as that promulgated in Revision 1 to the Standard Format will be required from the applicant during the course of the review to permit full evaluation of the reactor plant and site.

CONCLUSION

Based upon the review of all evaluation reports submitted by Technical Review, the information supplied by the Office of Anti-trust and Indemnity and Environmental Projects and the direct evaluation performed by the Project Licensing Assistant and Project Manager, it is recommended that the Davis-Besse application for an operating license be rejected. Although all other material of the application is acceptable, this recommendation is based on the determination by the Office of Site Safety that their portion of the FSAR is not sufficiently complete to start the detailed review. A letter has been prepared for concurrence and signature to inform the Applicant of our decision and to forward the list of FSAR deficiencies and comments. We are preparing to meet with the applicant to discuss the findings of the review.

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Pressurized Water Reactors Branch No. 4
Directorate of Licensing

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