UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137

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R. C. Knop, Chief, Reactor Projects Section 1

PROPOSED REVISION TO DAVIS-BESSE I FSAR TEST ABSTRACT; "LOSS OF STATION AIR TEST"

Revision 17 to the FSAR for the Davis-Besse I plant (Docket No. 50-346) drastically revised the test procedure abstract (Page 14-44) for the "Station Response to Loss of Instrument Air Test". Previous to this revision, the licensee was planning to shut down air headers and verify that safety related air operated devices moved to their "safe" position.

Their present test method no longer involves system headers but instead relies on reducing the air pressure to the individual air operators after appropriate isolation of the component.

I recommend that Licensing be informed that this revi. on would remove the verification by the licensee of which air operators are fed from various air system headers; I consider this verification of sub-system isolation capability to be important operating information. I wish to recommend that the review of this test by Licensing include a consideration that the licensee must verify that the air operators on safety related equipment are connected to system air headers in accordance with design drawings as part of this preoperational test activity.

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