

JAN 17 1977

51-346

MEMORANDUM FOR: James H. Sniezek, Chief, Light Water Reactor Programs  
Branch, I&E

FROM: Karl R. Goller, Assistant Director for Operating  
Reactors, DOR

SUBJECT: DAVIS-BESSE, UNIT 1 - PRESSURIZER AND STEAM LINE  
SAFETY VALVES

Your December 9th memo brought to our attention an apparent problem in setting the lifting pressure for pressurizer and steam line safety valves to meet the proposed Davis-Besse, Unit 1 Technical Specifications 3.4.2, 3.4.3 and 3.7.1.1. This apparent problem stems from the fact that the safety valve lifting pressure is temperature dependent and within the range of expected ambient temperatures the lifting pressure of the safety valves may exceed the setpoint specified in the proposed Technical Specifications.

The setpoint of the safety valve is established for nominal operating temperature and pressure conditions, including ambient conditions at the valve. This setpoint may be set and tested at various ambient temperatures, with various fluids, and by various methods, provided the lifting pressure is correlated to the specified setpoint at nominal operating conditions.

A decrease in the ambient temperature conditions at the valve with changing modes will effect the lifting pressure of the valve. The lifting pressure may slightly exceed the technical specification setpoint tolerance limits of +1%. Since the setpoint for nominal operating conditions has not changed, the drift of the lifting pressure of the safety valve outside of the +1% tolerance limits is acceptable. The drift of lifting pressure outside the tolerance limits with changing ambient conditions does not constitute non-compliance with the intent of the limiting condition for operation and therefore does not constitute an unreviewed safety question.

*memo*

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This apparent problem is generic to the Standard Technical Specifications. The Standard Technical Specifications and the Davis-Besse Specifications will be modified to clarify the original intent of these specifications. This modification will be the addition of the following footnote to Technical Specifications 3.4.2, 3.4.3 and 3.7.1.1: "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure".

Should you have further questions on this matter, please contact J. Roe of my staff.

Original signed by  
Karl R. Goller

Karl R. Goller, Assistant Director  
for Operating Reactors  
Division of Operating Reactors

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