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THRU: J. H. Sniezek, Chief, Light Water Reactor Programs Branch, IE:HQ

DAVIS-BESSE UNIT NO. 1 - PRESSURIZER SAPETY VALVES

In response to your memo to B. H. Grier, dated October 13, 1976, relating to the Davis-Besse Unit No. 1 pressurizer safety valves, the following information is provided:

Question 1:

What specific steps should we follow in applying Technical Specifications 3.4.2, 3.4.3 and 3.7.1.1 to Davis-Besse Unit No. 1 in light of the information we have on temperature dependence of safety valve settings?

Response:

The licensee cannot be permitted to knowingly violate the requirements of the Tachnical Specifications. He should take immediate steps to have any changes made that are required. If the inspector knows of a condition which violates the Tachnical Specifications, the licensee should be cited for an item of noncompliance.

We have sent a memo to Licensing that identifies the problem with the apparent temperature dependency of the pressurizer safety valves, and have asked for their prompt attention to this problem. (Suiezek to Coller dtd 12/9/76, copy enclosed.)

Question 2:

What generic implications, if any, exist with regard to the need to revise existing and Standardized Technical Specifications?

Response:

We have asked Linensing to review the Standardized Technical Specifications with regard to the temperature dependency problem. (Sniezek to Goller memo dtd 12/9/76.)

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Question 3:

Should additional information be required to be included in the FSAR to document the "agreement" between the licensee and NRR on conducting the safety valve tests inferred by PTC 25.2-1966?

Responsa:

No. PTC 25.2 establishes the requirements for a wide spectrum of possible tests, and Section 3 merely requires agreement on which tests are intended to be performed, and how.

The "agreement" is between NRR and the licensee, and consists of information now provided in the FSAR, supplemented by the TS requirements for set point, etc. IE's responsibility is to determine whether the testing is being performed in accordance with the "agreement."

In addition, as is the case for our entire inspection program, if in examining testing procedures or results, the inspector identifies a problem which requires resolution beyond Regional Office capabilities, the matter should be referred to IE Readquarters.

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