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

November 16, 1976

J. H. Sniezek, Chief, Light Water Reactor Programs Branch Office of Inspection and Enforcement, Headquarters

TOLEDO EDISON COMPANY (DAVIS-BESSE I) DOCKET NO. 50-346 REGIONAL COMMENTS ON "PROOF AND REVIEW" COPY OF DAVIS-BESSE I TECHNICAL SPECIFICATIONS

In accordance with the requirements of module 71301B, regional comments were forwarded to you by memorandum dated October 20, 1976 (AITS No. F30227H1). On November 15, we received revised sections to those specifications with a request from J. Roe of NRR to provide revised comments by December 1.

For convenience, we have referenced the item numbers contained in our October 20 memorandum. Please revise the previous comments as indicated below.

12. Table 4.3-2 - SFAS Surveillance

Revise to read: The intent of Note (3) of this table is unclear. Since each piece of activated SFAS equipment requires the actuation of output relays in two different preassigned Logic Channels to constitute one actuation channel, does this note mean that a SFAS component will be actuated once every two months with its redundant component actuated on an alternating schedule of two months?

13. Unnumbered - SFRCS Technical Specifications

Revise to read as follows:

13. T.S. 3.3.2.2. - SFRCS Instrumentation

The response time shown for the MSIVs (Table 3.3-13) conflicts with the value given in T.S. 4.7.1.5. We also note that no response time limit is given for minimum closure time. We believe this to be correct but we desire assurance that no limits need be imposed to reduce mechanical forces or pressure transients to acceptable values.



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33. Table 3.3-3 - SFAS Instrumentation

Revise to read: We believe the reference in ACTION 96 needs revision unless this nomenclature refers to the subset of Specifications 4.3.2.1.1, 4.3.2.1.2, and 4.3.2.1.3.

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Should you have any questions regarding these comments or those in our October 20, 1976 submittal, please contact R. D. Martin of this office.

G. Fiorelli

Reactor Operations and Nuclear Support Branch

cc: J. H. Grier, IE:HQ R. F. Warnick, Regional Coordinator IE Files <u>Central Files</u> J. G. Keppler