

December 27, 1989

Docket No. 50-346

Mr. Donald C. Shelton  
Vice President - Nuclear  
Toledo Edison Company  
Edison Plaza - Stop 712  
300 Madison Avenue  
Toledo, Ohio 43652

Dear Mr. Shelton:

SUBJECT: REQUEST FOR LICENSE AMENDMENT TO REVISE THE SURVEILLANCE INTERVAL  
FOR THE DAVIS-BESSE REACTOR VESSEL INTERNALS VENT VALVES  
(TAC NO. 73384)

In your letter dated August 1, 1989, you requested a license amendment to revise the 18-month surveillance interval for inspection and operability testing of the reactor vessel internals vent valves (RVVVs). The present Davis-Besse Technical Specifications (TSs) require the RVVVs to be visually inspected and manually actuated at least once per 18 months during shutdown (TS 4.4.10.1.b). Your TS amendment request proposed extending this surveillance interval to an indefinite period identified as "during shutdown for refueling." We find that you have not submitted sufficient justification for this request as it is presently proposed. Accordingly, we request that you submit additional information to support your present proposal. Alternatively, you may choose to resubmit your application on this matter including a specific time limit past which the required surveillance requirements of TS 4.4.10.1.b would not extend.

Our concern on this matter is that the RVVVs serve an important function in the mitigation of the limiting design basis accident (DBA) involving a loss-of-coolant accident (LOCA). Accordingly, any proposed change to the TS's related to the surveillance requirements of the RVVVs must consider the very important function they serve in protecting the reactor core in the event of a DBA-LOCA. Since your proposed TS amendment does not address our concern on this matter, we find that your request for an extended surveillance interval without a limiting maximum time period is not acceptable. Specifically, we find that there is a very limited operating performance data base with which to justify extending this particular surveillance interval for an indefinite period as you presently propose.

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Mr. Donald C. Shelton

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We recently considered a similar request on a similar B&W plant and in that instance granted, in September 1988, an extension of the surveillance interval for the RVVVs from once per 18 months to once per 24 months. We anticipate that you can provide justification to support a TS amendment request for a comparable extension of this surveillance interval.

If you have any questions on this matter, please contact me at (301) 492-3063.

Sincerely,

/s/

Thomas V. Wambach, Sr. Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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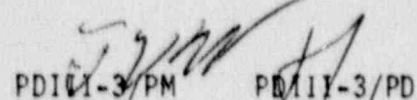
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