

Docket Number 50-346  
License Number NPF-3  
Serial Number 1737  
Enclosure  
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APPLICATION FOR AMENDMENT  
TO  
FACILITY OPERATING LICENSE NUMBER NPF-3  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NUMBER 1

Attached are requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included are the Technical Description and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 1737) concern:

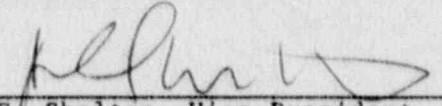
Section 3/4.6.3.1, Containment Isolation Valves, Table 3.6-2, Containment Isolation Valves

Section 3/4.6.1.1, Containment Integrity

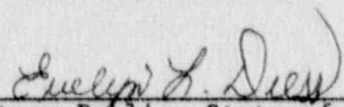
Definition Section Number 1.8, Containment Integrity

Bases Section 3/4.6.3, Containment Isolation Valves.

By:

  
D. C. Shelton, Vice President, Nuclear

Sworn and Subscribed before me this 22nd day of December, 1989

  
Notary Public, State of Ohio

EVELYN L. DRESS  
NOTARY PUBLIC, STATE OF OHIO  
My Commission Expires July 28, 1994

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The following information is provided to support issuance of the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications, Section 3/4.6.3.1, Containment Isolation Valves, Table 3.6-2, Containment Isolation Valves, Section 3/4.6.1.1, Containment Integrity, Definition Section Number 1.8, Containment Integrity, Bases Section 3/4.6.3, Containment Isolation Valves.

A. Time Required to Implement: This change is to be implemented within 45 days after the NRC issuance of the License Amendment.

B. Reason for Change (License Amendment Request Number 89-0017):

Removal of TS Table 3.6-2 will remove an administrative burden from both the utility and the NRC in that changes to the table would be accomplished in accordance with 10CFR50.59. The test requirements for containment isolation valves will remain in the TS.

C. Technical Description: See attached Technical Description (Attachment 1).

D. Significant Hazards Consideration: See attached Significant Hazards Consideration (Attachment 2).

## TECHNICAL DESCRIPTION

### Description of Proposed Technical Specification Change

This Technical Description discusses proposed changes to Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License, Appendix A, Technical Specifications (TS) 3/4.6.3.1, Containment Isolation Valves, Table 3.6-2, Containment Isolation Valves, TS 3/4.6.1.1, Containment Integrity, TS Definition 1.8, Containment Integrity, and TS Bases 3/4.6.3, Containment Isolation Valves. This request proposes to remove TS Table 3.6-2 from the TS and relocate the list of containment isolation valves and associated information to the Updated Safety Analysis Report (USAR). This change would allow future changes to be made to the table in accordance with 10CFR50.59 while maintaining the surveillance test requirements for containment isolation valves in the TS. The change also removes the applicability of TS 3.0.4 to TS 3.6.3.1 which will allow mode changes to be made with inoperable containment isolation valves provided compliance with the action statement of LCO 3.6.3.1 is maintained. This request is similar to the License Amendment issued by the NRC on May 22, 1989, that deleted the Containment Isolation Valve table from the Operating License Technical Specifications for the Crystal River Unit Number 3 Nuclear Generating Plant.

### Systems Affected

Containment Isolation Valves (no hardware change)

### Safety Function of System Affected

The safety function of the containment isolation valves is to isolate those containment penetrations which are not required to open or remain open to mitigate the consequences of an accident. The operability of containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of containment. Containment isolation within the time limits specified ensures that the release of radioactivity to the environment will be consistent with the assumptions used in the safety analysis for a loss-of-coolant-accident (LOCA).

### Effects on Safety/Proposed Change

All items and information currently contained in the containment isolation valve Table 3.6-2 will be removed from the TS and relocated to the USAR. In addition, this information will be maintained within another controlled document for updating with changes that occur during the time period between USAR revisions. The requirement for containment isolation valve operability along with the associated action statements and surveillance requirements will remain in the TS. The relocation of Table 3.6-2 is an administrative matter which would allow future changes to be made without a license amendment, relieving both the NRC and Toledo Edison of an administrative burden. Maintaining information from Table 3.6-2 in the USAR also assures that the information is still available to the operators. Furthermore, maintaining



containment isolation valve information from Table 3.6-2 within another controlled document which is updated with approved changes during the time period between published USAR revisions will ensure that an up-to-date listing of containment isolation valve information will be available to the operators between USAR revisions. Future changes to the table would only be implemented after an evaluation in accordance with 10CFR50.59 has been completed.

The proposed change to Surveillance Requirement (SR) 4.6.3.1.1 clarifies that when work is done on a valve that would not affect the valve's performance, a valve stroke test to demonstrate isolation time compliance is not required. For example, an activity like handwheel replacement which would not degrade valve performance would not need a stroke test. Work which could affect valve performance would still require retesting for operability, thus no existing safety margins are affected.

In order to ensure that surveillance requirements address the isolation time requirements in the Limiting Condition for Operation (LCO), Surveillance Requirement 4.6.3.1.3 has been added to reflect the requirement to determine isolation times are within limits for power operated or automatic containment isolation valves during TS 4.0.5 testing.

A footnote has been included which will maintain an existing provision in Table 3.6-2 which allows for not surveillance testing valves MS100, MS101, ICS11A, and ICS11B prior to entering Mode 4, but requires that the valves be tested before entering Mode 3. This is an administrative change which allows this previously approved provision to remain in the Technical Specification.

A footnote has been added to remove the applicability of TS 3.0.4 to TS 3.6.3.1 which will allow mode changes to be made with inoperable containment isolation valves. This change would permit plant startup with any of the containment isolation valves listed in Table 3.6-2 inoperable as long as action statement b or c of TS 3.6.3.1 is satisfied. For the purposes of containment isolation function, the isolated position is the safe position for an inoperable containment isolation valve and the associated containment penetration. However, certain containment isolation valves are required to open following an accident to mitigate the consequences of that accident (e.g., High Pressure Injection line valves). Securing the valves in the required safety related systems in a closed position would impact the use of those valves. However, the operability of those systems with containment isolation valves secured in a closed position will be governed by the LCOs for those systems.

References to the Containment Isolation Valve table have been deleted in Definition 1.8, SR 4.6.1.1.a.1, TS 3.6.3.1, SR 4.6.3.1.1 and SR 4.6.3.1.2. The present exception in Table 3.6-2 allowing opening of certain valves under administrative control has been retained in Definition 1.8, SR 4.6.1.1.a.1 and TS 3.6.3.1 by adding appropriate wording. Bases 3/4.6.3, Containment Isolation Valves, has been revised to reflect the Technical Specification changes. Concurrent with removal of Table 3.6-2, these changes are administrative in nature only.

The existing footnote in Table 3.6-2 which indicates the valves which are not subject to 10CFR50 Appendix J Type C testing is a clarifying note. Therefore, this note will not be maintained in the TS, but the information on which valves do not require Type C testing will be maintained in the USAR for clarification and reference.

#### Unreviewed Safety Question/Evaluation

The proposed changes would not increase the probability of occurrence of an accident previously evaluated in the USAR because no hardware changes are being made and no initiators are affected or created (10CFR50.59(a)(2)(i)).

The proposed changes would not increase the consequences of an accident previously evaluated in the USAR because the accident conditions and assumptions are not affected since the changes are administrative and no hardware changes are being made. The TS will continue to require operable containment isolation valves and appropriate surveillance requirements (10CFR50.59(a)(2)(i)).

The proposed changes would not increase the probability of occurrence of a malfunction of equipment important to safety previously evaluated in the USAR because no station equipment or operation is being modified. The TS will continue to require operable containment isolation valves and appropriate surveillance requirements (10CFR50.59(a)(2)(i)).

The proposed changes would not increase the consequences of a malfunction of equipment important to safety previously evaluated in the USAR because no station equipment or operation is being modified and TS will continue to ensure operable containment isolation valves (10CFR50.59(a)(2)(i)).

The proposed changes would not create the possibility for an accident of a different type than any evaluated previously in the USAR because no hardware changes are being made and no initiators are affected or created (10CFR50.59(a)(2)(i)).

The proposed changes would not create the possibility for a malfunction of a different type than any evaluated previously in the USAR because no station equipment is being modified (10CFR50.59(a)(2)(ii)).

The proposed changes would not reduce the margin of safety as defined in the basis for any Technical Specification since the TS will continue to require operable containment isolation valves and appropriate surveillance requirements ((10CFR50.59(a)(2)(iii)).

Based on the above, it is concluded that the proposed Technical Specification changes do not constitute an unreviewed safety question.