



A Gentener Energy Company

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Docket Number 50-346

License Number NPF-3

Serial Number 1747

February 1, 1990

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Technical Specification Bases 3/4.1.2, Boration Systems, Revision to Support License Amendment Application to Delete the Reference to Surveillance Requirement 4.0.5 from the Boric Acid Pumps Technical Specifications (TAC Number 68071)

Gentlemen:

Toledo Edison (TE) previously submitted a License Amendment Application on July 28, 1988 (letter Serial Number 1524) to delete the references to Surveillance Requirement 4.0.5, inservice inspection and testing of ASME Code Class 1, 2 and 3 components, from the Davis-Besse Nuclear Power Station (DBNPS) Boric Acid Pumps Technical Specifications (TS) 3/4.1.2.6 and 3/4.1.2.7. This amendment application was based on the fact that the boric acid pumps are not required to mitigate the consequences of an accident, shutdown the reactor, or maintain it in a shutdown condition under design basis accident conditions. The boric acid pumps are required in the event of a loss of the Borated Water Storage Tank due to a tornado, which is a design consideration versus a design basis accident. Therefore, as discussed in Section 9.3.6.3.1 of the DBNPS Updated Safety Analysis Report, the boric acid pumps are not required to be safety-related and, thus, are not required to be subject to ASME Section XI testing.

The above information was discussed with Mr. T. V. Wambach, NRC/NRR Senior Project Manager, DBNPS on October 11, 1989. Mr. Wambach stated that in order to delete the Specification 4.0.5 requirements from TS 3/4.1.2.6 and TS 3/4.1.2.7, Bases Section 3/4.1.2 should be revised to clarify that the boric acid pumps are only required for tornado considerations. The attached proposed revision to Bases Section 3/4.1.2 provides the necessary clarification to reflect the boric acid pumps and boric acid storage tanks design consideration, and is consistent with the application submitted by Serial Number 1524.

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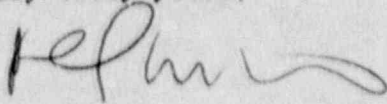
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Based on the above, the License Amendment Application submitted by Serial Number 1524 with the additional clarification contained herein provides the necessary information and proposed TS changes to facilitate processing and issuance of a Technical Specification amendment.

Toledo Edison requests that the Technical Specification amendment be issued by February 23, 1990, for implementation within 45 days after issuance of the amendment.

If you have any questions please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



RMC/ssg

Attachment

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
A. B. Davis, Regional Administrator, NRC Region III
T. V. Wambach, DB-1 NRC/NRR Senior Project Manager
State of Ohio