



6200 Oak Tree Boulevard
Independence OH
216-447-3153
Fax 216-447-3123

Mail Address:
P.O. Box 94661
Cleveland, OH 44101-4661

Donald C. Shelton
Senior Vice President
Nuclear

Docket Number 50-346

License Number NPF-3

Serial Number 2208

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United States Nuclear Regulatory Commission
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Subject: Supplemental Information for License Amendment Request to
Revise Technical Specification 3/4.3.3.5, Instrumentation -
Remote Shutdown Instrumentation and its Bases, and Technical
Specification 6.9.2, Special Reports

Gentlemen:

By letter dated December 23, 1992 (Serial Number 2101), an application for an amendment to Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License Number NPF-3, Appendix A was submitted, proposing changes to Technical Specification (TS) 3/4.3.3.5, Instrumentation - Remote Shutdown Instrumentation and its Bases, and TS 6.9.2, Special Reports. This license amendment application fulfilled Toledo Edison's (TE) commitment, as documented in TE letter Serial Number 2070, dated July 28, 1992, to submit a proposed revision to TS 3/4.3.3.5 and its Bases by adding testing requirements for certain transfer switches used to meet 10 CFR Part 50, Appendix R (Fire Protection) requirements.

The primary purpose of this letter is to clarify information regarding physical operation of components, as discussed during a telephone conference call with the NRC Staff on February 7, 1994. This letter also provides the additional information requested in the same February 7, 1994 conference call, regarding anticipated compensatory measures that would be put in place in the event a transfer switch becomes inoperable for greater than 30 days. Finally, this letter provides the results of TE's research into vendor recommendations for transfer switch testing, as requested during a telephone call with the NRC Staff on January 19, 1994.

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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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This letter provides supplemental information and the conclusion stated in TE's letter dated December 23, 1992 (Serial Number 2101), that the license amendment application does not involve a significant hazards consideration remains unaffected.

Physical Operation of Components

Page 3 of the Attachment to Serial Number 2101 states:

The purpose of testing the transfer switches is to verify on a periodic basis that the switches are capable of performing their intended functions. This testing will demonstrate that equipment operates from the local control station when the transfer or isolation switch is placed in the "local" position and that the equipment cannot be operated from the control room. This testing will also demonstrate that equipment operates from the control room when the transfer or isolation switch is returned to the normal position.

As discussed in TE's conference call with the NRC Staff on February 7, 1994, for some safe shutdown equipment, particularly the 4160V pump motors, transfer switch testing can be accomplished without physically operating the equipment. For example, the 4160V breaker for Service Water Pump P3-1 can be placed in the "TEST" position and a pump start simulated during transfer switch testing. This will minimize wear on the pump and motor, and yet will still test the transfer switch and control circuit. In addition, it will provide maximum flexibility in scheduling and performing the test during an outage since the pump itself will not be required to be available for service, and, most importantly, a flowpath will not need to be available and established. Accordingly, TE clarifies that surveillance testing procedures will be established requiring demonstration that the applicable safe shutdown equipment is capable of operation using the associated transfer switches and control circuits, however, in some cases, physical operation of the equipment will not be required in order to perform this demonstration.

Compensatory Actions

Once the license amendment is approved and implemented, a new TS 3/4.3.3.5 Action statement will require the preparation and submittal of a Special Report to the NRC in the event that a circuit or switch is inoperable for longer than 30 days. This Special Report will outline the actions taken, the causes of the inoperability, and the plans and schedule for restoring the operability of the circuit or switch. Toledo Edison anticipates that, in the event that the Action statement is entered due to an inoperable circuit or switch compensatory measures would be established similar to those that would be established in the event a fire barrier is inoperable, i.e., a continuous fire watch established or, assuming fire detection is available, an hourly fire watch established.

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Vendor Recommendations

The transfer switches are manufactured by General Electric and Westinghouse. TE has reviewed the vendor documentation provided for the switches and has found no vendor recommendations regarding reliability and test frequencies. Only periodic inspection of the switch for broken parts and degraded contacts is recommended. Toledo Edison's experience with these types of switches indicates that normal operation and periodic testing will provide ample opportunity to detect switch degradation. The mild environment in the plant has resulted in good contact reliability for switches. Therefore, TE believes that an 18 month test interval is reasonable for this type of component.

If you have any questions, please contact Mr. W. T. O'Connor, Manager - Regulatory Affairs at (419) 249-2366.

Very truly yours,



MKL

cc: J. B. Martin, Regional Administrator, NRC Region III
R. J. Stransky Jr., DB-1 NRC/NRR Project Manager
S. Stasek, NRC Region III, DB-1 Senior Resident Inspector
J. R. Williams, Chief of Staff, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board