

Donald C. Shelton
Vice President - Nuclear
Davis-Besse

300 Madison Avenue
Toledo, OH 43652-0001
(419) 249-2300

Docket Number 50-346

License Number NPF-3

Serial Number 1866

November 5, 1990

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

Subject: Request for Temporary Exemption from Filing Requirements for
Simulation Facility Certification

Gentlemen:

The Toledo Edison Company plans to comply with 10 CFR 55.45(b)(2)(iii) for the Davis-Besse Nuclear Power Station (DBNPS) Unit No. 1 by certification of a plant referenced simulation facility in accordance with 10 CFR 55.45(b)(5)(i). However, due to special circumstances regarding the manufacturing and software programming of the simulator, the March 26, 1991 deadline for submitting Form NRC-474, "Simulation Facility Certification" will not be achieved.

The Toledo Edison Company hereby requests a temporary exemption from the filing requirements of 10 CFR 55.45(b)(2)(iii) to allow for the submittal of Form NRC-474, "Simulation Facility Certification" after the March 26, 1991 deadline provided in the regulation. Pursuant to Generic Letter Number 90-08, Simulation Facility Exemptions, the requirements of 10 CFR 50.12(a)(2)(v), have been addressed whereby, the Nuclear Regulatory Commission may upon application, grant an exemption when the exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation.

Toledo Edison has made good faith efforts to comply with 10 CFR 55.45(b)(2)(iii) and requests a temporary exemption from filing Form NRC-474 until September 1, 1991. This date is 60 days prior to the DBNPS's first scheduled operator license examinations to be administered on the simulator. The means for conducting operator examinations will not be affected by this delay, as the DBNPS's May operator examinations are scheduled to be administered prior to May 26, 1991 (the deadline for using a noncertified or unapproved simulation facility under 10 CFR 55.45(b)(iv)). The importance of ensuring that the May 1991 NRC operator examinations are conducted prior to May 26, 1991, was discussed by Toledo Edison representatives and Mr. T. Burdick, NRC Region III on October 23, 1990. These examinations are currently scheduled for the week of May 13, 1991. No other examinations requiring the use of the simulator are scheduled between May 26, 1991 and November 1, 1990.

9011130213 901105
PDR ADOCK 05000346
P PDC

Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

ADDS
1/0

There are several special circumstances responsible for the delay in the schedule. Completion of the simulator specification contract took six months longer than expected as it involved extensive negotiations that involved two other utilities purchasing common simulators at the same time from the same vendor (CAE Electronics, Ltd.). The initial simulator schedule was established prior to the June 9, 1985 DBNPS Loss-of-Feedwater Event. After this event, the resulting eighteen-month work outage and restart effort diverted Toledo Edison manpower from the simulator project. Additional manpower was diverted from the simulator project to support operations during the 1986 bargaining unit strike. Due to these unplanned circumstances, the simulator purchase order was not placed until August 1, 1986. It was accepted by the simulator vendor on September 5, 1986.

Toledo Edison advised the Nuclear Regulatory Commission (NRC) on June 1, 1988, (letter Serial Number 1530) and on July 13, 1988, (letter Serial Number 1548) that the simulator installation would again be delayed. At that time, Toledo Edison stated that the simulator was expected to be installed in the DBNPS Nuclear Training Center by June 30, 1989, and be ready for training use by December 31, 1989. Following this notification, delays on the simulator occurred due mainly to problems the vendor encountered during software development and software/hardware integration. As a result, Toledo Edison had to postpone the simulator installation until January 1990, beyond the end of the Fifth Refueling Outage (September, 1988).

As a result of the delay in the installation, a decision was made to upgrade the simulator to reflect the Fifth Refueling Outage modifications prior to making it available for training use. The Fifth Refueling Outage modifications require simulator hardware and software changes that involve replacement of meters, relocation of instrumentation, installation of new switches, indicating lights, etc. These modifications are necessary due to 93 plant modifications and the resulting modifications made to the DBNPS Control Room. They included extensive changes made to the Auxiliary Feedwater System, the Steam and Feedwater Rupture Control System, Feed and Bleed Cooling, and resolution of numerous human engineering deficiencies as part of the post TMI-2 required Detailed Control Room Design Review. This upgrade is planned to be completed by December 1990.

After the simulator is shipped, currently planned for January 10, 1991, it will require reassembly, a complete checkout, reverification testing, and the performance of an availability test. After these activities are complete, Toledo Edison plans to install selected Sixth Refueling Outage (January - July, 1990) upgrades prior to releasing the simulator for training use. The selected changes, which will include the rearrangement of a major percentage of control room annunciators, relocation of several important switches, and the addition of an alternate makeup system injection line to the reactor coolant system, are considered to have a negative impact on training quality if not incorporated prior to training use. Since installation of these changes is precluded by post delivery activities until May 1991, these modifications will be developed, installed, and certification tests performed in preparation for Form 474 submittal in September 1991.

Docket Number 50-346

License Number NPF-3

Serial Number 1866

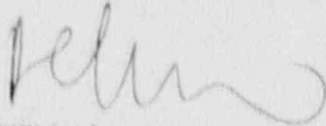
Page 3

Toledo Edison believes that the delays experienced to date were unavoidable and that the remaining upgrade to include the extensive plant modifications are necessary and will provide a more suitable plant specific simulator.

The granting of this requested extension for filing Form NRC-474 will not endanger public health and safety and is consistent with the common defense and security. The Nuclear Regulatory Commission has itself recognized in the Supplementary Information published along with the Final Rule to 10 CFR 55.45 that unique circumstances may arise on a plant-specific basis that causes some deviation from the certification time established in the rule. Where, as in this case for the DBNPS, the licensee has made reasonable efforts to comply with the filing requirements and otherwise intends to fully comply with 10 CFR 55.45, such exemption should be granted. Therefore, Toledo Edison requests a temporary exemption from 10 CFR 55.45(b)(2)(iii) until September 1, 1991.

Should you have any questions or require additional information, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



FWK/mmb

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
A. B. Davis, Regional Administrator, NRC Region III
M. D. Lynch, DB-1 NRC Senior Project Manager
Utility Radiological Safety Board