

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NO. NPF-3
FOR
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NO. 1

Enclosed are forty-three (43) copies of the requested changes to the Davis-Besse Nuclear Power Station Unit No. 1 Facility Operating License No. NPF-3, together with the Safety Evaluation for the requested change.

The proposed changes include Section 3.0.4, 4.0.4 and Bases.

By /s/ R. P. Crouse
Vice President, Nuclear

Sworn and subscribed before me this 5th day of November, 1982.

Laurie A. Hinkle, nee (Brudzinski)
Notary Public, State of Ohio
My Commission Expires May 16, 1986

S E A L

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Docket No. 50-346
License No. NPF-3
Serial No. 8/2
November 5, 1982

Attachment

- I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A Technical Specifications Section 3.0.4, 4.0.4 and Bases.
 - A. Time required to Implement. This change is to be effective upon NRC approval.
 - B. Reason for Change (Facility Change Request 82-158A)
In response to Mr. J. F. Stolz letter dated October 13, 1982 (Log No. 1112).
 - C. Safety Evaluation
(See attached)

SAFETY EVALUATION

This amendment request changes two Sections, 3.0.3 and 4.0.3, of the Davis-Besse (DB) Technical Specifications. The safety function of Section 3.0.3 is to provide for a shutdown of the unit, if required, due to equipment inoperability that places the plant both outside the limiting condition for operation and the applicable action statement.

The DB Technical Specifications currently require the unit to be placed in hot standby (Mode 3) within one hour of the time the plant goes outside the bounds of the action statement. If the plant is operating at high power levels, it cannot be shutdown in a controlled manner within one hour. Compliance with the one hour requirement, therefore, places a potential challenge to safety that the Technical Specification Limiting Conditions for Operation and the Action Statements are designed to prevent. The B&W STS (Rev. 4), however, allows six hours to reach Mode 3 with the provision that actions be initiated to place the unit in Mode 3 within one hour. Since the six hour time period allows a more orderly shutdown, the potential for challenge to Davis-Besse's safety systems, based on engineering judgement, is lowered, thereby increasing the margin of safety.

The safety function of Section 4.0.3 is to provide guidance in the determination of equipment/system operability in the event of missed surveillance tests. This amendment adds up to a 72 hour period to allow the missed test to be performed before entry into the shutdown statement is required. This period will help avoid an unnecessary transient on the plant, and a potential challenge to safety systems. As an example, current Technical Specifications allow one emergency diesel generator to be out of service (proven inoperable) for 72 hours, so it can be justified that a similar extension for a potentially inoperable system should be given to avoid unnecessary plant transients like a shutdown that may challenge the system that is in question. Based on engineering judgement, the relative risk due to potential inoperability of a missed surveillance test is lower than the risk due to a plant shutdown created transient before a surveillance can be performed to confirm the actual condition of the equipment. Therefore, based on engineering judgement, the margin of safety of Davis-Besse will not be decreased by this amendment.

This amendment request does not involve an unreviewed safety question.

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