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Docket Number 50-346

License Number APF-3

Serial Number 1876

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United States Nuclear Regulatory Commission
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Washington, D. C. 20555

Subject: Administrative Change to Technical Specification Bases 3/4.7.1.3,
Condensate Storage Tanks (TAC Number M79671)

Gentlemen:

The attached administrative change to the Davis-Besse Nuclear Power Station (DBNPS), Unit 1 Technical Specifications (TS) Bases is being made to correct an inconsistency which exists in TS Bases 3/4.7.1.3 as compared to the Updated Safety Analysis Report (USAR), NUREG-0136 (Safety Evaluation Report Related to Operation of DBNPS, Unit 1, December 1976), and the Safety Evaluation Report received accepting Toledo Edison's (TE's) response to Generic Letter (GL) 81-21 (Toledo Edison (TE) letter Log Number 3163, dated February 2, 1990).

The DBNPS TS Bases 3/4.7.1.3 presently states, in part, "...that sufficient water is available [in the condensate storage tanks] to maintain the Reactor Coolant System (PCS) at HOT STANDBY conditions for 13 hours with steam discharge to the atmosphere and to cooldown the RCS to less than 280°F in the event of a total loss of offsite power or of the main feedwater system..." [emphasis added]. The cited emphasis portion of the above is inconsistent with USAR Section 9.2.6.1 which states, "Condensate storage is provided..., under normal conditions, for hot shutdown or cooldown of the reactor." NUREG-0136, Section 9.3.4, states "For a normal hot shutdown or cold shutdown of the reactor, the condensate storage capacity is sufficient to remove decay heat for 13 hours plus a subsequent cooldown to 280°F." In each of the documents, "normal conditions" or "normal shutdown" is used to qualify the design basis capacity of the condensate storage tanks. As used therein, "normal" refers to the availability of onsite power during the shutdown.

This is further evidenced by TE's response (TE letter Serial Number 969 dated August 2, 1983) to GL 81-21 Natural Circulation Cooldown, dated May 5, 1981 (TE letter Log Number 714), and the subsequent Request for Additional

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Docket Number 50-346

Licenses Number NPF-3

Serial Number 1876

Page 2

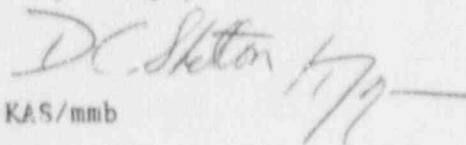
Information dated June 1, 1983 (TE letter Log Number 1300), in which it was stated that natural circulation cooldown was supported for: 1) 34 hours assuming the condensate storage tanks contained the TS minimum volume of 250,000 gallons, and 2) 72 hours with both condensate storage tanks filled to a level corresponding to the low level setpoint. The response also stated that the time required to cool the RCS to decay heat removal (DHR) entry conditions, assuming a loss of offsite power and a cooldown rate of 1- $\frac{1}{2}$ °F per hour, was approximately 150-200 hours. Upon depletion of the inventory in the condensate storage tanks, additional cooling water capacity to support auxiliary feedwater system operation during natural circulation cooldown would be provided by the Seismic Category I service water system, which has Lake Erie as its source. The switchover to the service water system is automatic on auxiliary feedwater pump low suction pressure.

The Nuclear Regulatory Commission (NRC) staff accepted TE's response to GL 81-21 by Safety Evaluation Report (SER) transmitted on February 2, 1990 (TE letter Log Number 3163, NRC TAC Number 47182). Based on TE's response and NRC's acceptance, as well as the information contained in the DBNPS USAR and NUREG-0136, it is evident that the DBNPS TS Bases 3/4.7.1.3 is inconsistent with the original and continued licensing basis of the plant. Therefore, the attachment provides a change to the DBNPS TS Bases reflecting that the condensate storage tank capacity is sufficient to cool down the RCS to DHR entry conditions "...under normal conditions (no loss of offsite power)".

The above cited change is administrative in nature as it corrects an error in the DBNPS TS Bases and is consistent with the original DBNPS design as accepted by NRC for addressing natural circulation cooldown events. TE requests that this change be issued by June 1, 1991.

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

Very truly yours,



KAS/mmb

attachment

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
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