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Docket Number 50-346

License Number NPF-3

Serial Number 1902

February 6, 1991

United States Nuclear Regulatory Commission
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Washington, DC 20555

Subject: License Amendment Application to Revise Technical
Specification 3.1.1.3, Moderator Temperature Coefficient
(TAC Number M79449)

Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications to reflect the attached change. The proposed change involves Technical Specification (TS) 3/4.1.1.3, Reactivity Control Systems - Moderator Temperature Coefficient, and Technical Specification (TS) 6.9.1.7, Core Operating Limits Report.

This request proposes revising Limiting Condition for Operation 3.1.1.3c to refer to the DBNPS Core Operating Limits Report for the value of the Negative Moderator Temperature Coefficient limit. Also Technical Specification 6.9.1.7, Core Operating Limits Report, will be revised to include 3.1.1.3c, the Negative Moderator Temperature Coefficient Limit in its requirements.

Toledo Edison's response to Generic Letter 88-16, Removal of Cycle-Specific Parameter Limits from Technical Specifications, (Toledo Edison letter Serial Number 1668, dated June 16, 1989), originally requested removing Technical Specification 3.1.1.3 from the Technical Specifications in its entirety. The Nuclear Regulatory Commission Staff, in a telephone call, concurred with the relocation of the Negative Moderator Temperature Coefficient Limit but requested that the positive upper bounds of the Moderator Temperature Coefficient remain in the Technical Specifications. Rather than divide the Limiting Condition for Operation between the Technical Specifications and the Core Operating Limits Report (COLR), Toledo Edison elected at that time to

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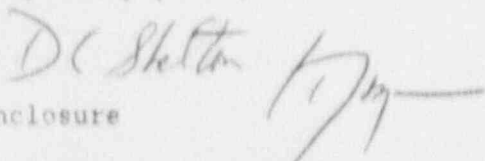
retain the Specification as it now exists. This communication is documented in Toledo Edison letter Serial Number 1691 to the NRC dated August 21, 1989. This letter was a resubmittal of Serial 1668 removing the request to relocate the moderator temperature coefficient technical specification.

Due to the installation of extended operating cycle cores, it has become necessary to recalculate the limit of the Negative Moderator Temperature Coefficient for each core cycle. The limit of the Negative Moderator Temperature Coefficient may be different for each operating cycle. With the Negative Moderator Temperature Coefficient contained in the Technical Specifications it still is necessary to submit a license amendment application for each new reload cycle if the limit changed. To reduce this number of future required license amendment applications, Toledo Edison now requests that the Negative Moderator Temperature Coefficient portion of Technical Specification 3.1.1.3 be relocated to the Core Operating Limits Report. Technical Specification 6.9.1.7 is proposed to be revised to reference the Negative Moderator Temperature Coefficient Limit. This then is consistent with the intent of NRC Generic Letter 86-16 and NRC staff desires to retain the positive upper bounds of the Moderator Temperature Coefficient.

As previously discussed with the NRC Staff, Toledo Edison requests that this amendment be issued by the NRC by March 29, 1991, which is prior to the performance of the associated surveillance testing required after reaching a rated thermal power equilibrium boron concentration of 300 ppm (Surveillance Requirement 4.1.1.3.2b).

If you have any questions regarding this amendment request, please contact Mr. K. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



Enclosure

cc: DB-1 NRC Senior Resident Inspector
A. B. Davis, Regional Administrator, NRC Region III
D. C. Di Ianni, DB-1 NRC Senior Project Manager
State of Ohio
General J. Williams, Chief of Staff, Adjutant General - State of Ohio
Utility Radiological Safety Board