Docket Number 50-346
License Number NPF-3
Serial Number 1903
Enclosure
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APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NUMBER NPF-3
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

Attached is the requested change to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included are the Safety Assessment and Significant Hazards Consideration.

The proposed change (submitted under cover letter Serial Number 1903) concerns:

Technical Specifications Section 6.2.2, Facility Staff.

By: _____
D. C. Shelton, Vice President - Nuclear

Sworn and subscribed before me this 1st day of March, 1991.

_____
Notary Public, State of Ohio

EVELYN L. DRESS
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires July 28, 1994

The following information is provided to support issuance of the requested change to the Davis-Besse Nuclear Power Station, Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications, Section 6.2.2.

A. Time Required to Implement: This change is to be implemented within 45 days after the NRC issuance of the License Amendment.

B. Reason for Change (License Amendment Request Number 90-0039): The addition of the footnote, to the Technical Specifications to allow one of the two required individuals filling the SOL positions to assume the STA function, will provide greater flexibility for meeting shift manning requirements while maintaining on shift expertise to recognize and effectively deal with plant transients or other abnormal conditions.

C. Safety Assessment and Significant Hazards Consideration: See Attachment 1.

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 90-0039

TITLE:

License Amendment Request (LAR) to Revise the Minimum Shift Crew Composition in Technical Specification (TS) 6.2.2, Facility Staff.

DESCRIPTION:

The purpose of the proposed change is to revise Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A, TS 6.2.2 (Administrative Controls - Facility Staff), Table 6.2-1, Minimum Shift Crew Composition. The proposed change is consistent with the Nuclear Regulatory Commission's (NRC's) guidance (Generic Letter (GL) 86-04, dated February 13, 1986, Policy Statement on Engineering Expertise on Shift, Log Number 1919) to allow one of the two positions of Senior Reactor Operator (SRO), and the position of Shift Technical Advisor (STA) to be filled by a single, properly trained individual. This guidance specified two options for meeting the current requirements for providing engineering expertise on shift (NUREG-0737, Clarification of Three Mile Island (TMI) Action Plan Requirements, Item I.A.1.1) and meeting licensed operator staffing requirements (10 CFR 50.54(m)(2)) of the required STA position. Option 1 provides for the elimination of the separate STA position by allowing a licensee to combine one of the required SRO positions with the STA position into a dual-role (SRO/STA) position. Option 2 states that a licensee may continue to use an NRC-approved STA program while meeting license operator staffing requirements. A licensee may use either option on each shift.

This LAR proposes that TS 6.2.2, Table 6.2-1 be revised to allow Toledo Edison to utilize either option in meeting the minimum shift crew composition requirements. A footnote (**) is proposed to be added to the SRO and STA categories of Table 6.2-1 which states:

> One of the two required individuals filling the SOL positions may also assume the STA function provided the individual meets the qualifications for the combined SRO/STA position specified for Option 1 of the Commission's Policy Statement on Engineering Expertise on Shift. If this option is used for a shift, then the separate STA position may be eliminated for that shift.

At the DBNPS, the Shift Manager currently functions as the STA. Under this proposed change, the Shift Manager may function as both the STA and one of the required SRO positions (i.e., a dual-role SRO/STA function).

This proposed TS revision is similar to that approved by the NRC in Amendment No. 64 to the Grand Gulf Nuclear Station, Unit 1, Facility Operating License No. NPF-29, dated September 28, 1989.

SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED:

The proposed change would affect the requirements for meeting minimum shift crew staffing requirements. More specifically, it would affect control room activities involving the STA position.

SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The function of the TS requirements for a minimum shift crew composition is to ensure that a sufficient number of trained and qualified personnel are available on each duty shift to operate the station in a safe manner. The function of the STA is to provide on shift engineering and accident assessment advice to the shift supervisor in the event of abnormal or accident conditions.

EFFECTS ON SAFETY:

The STA requirement was identified to licensees in NUREG-0578, TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations, (July 1979) and NUREG-0737 (November 1980), Clarification of TMI Action Plan Requirements. Concurrently, the NRC and industry undertook a longer term effort to upgrade staffing levels and the training and qualifications of the operating staffs, improving the man-machine interface, and increasing the capabilities for responding to emergencies. At the time the STA requirement was imposed, it was intended that the use of the dedicated STA would be an interim measure only until these longer term efforts were completed.

These longer term efforts have collectively resulted in an improvement in the capabilities and qualifications of the shift crew and their ability to diagnose and respond to accidents. These initiatives include shift staffing increases, training and qualification program improvements, hardware modifications, emphasis on human factor considerations, procedural upgrades and the development of extensive emergency response organizations to augment on shift capabilities during abnormal conditions.

The proposed administrative TS change will allow either option of the NRC's "Policy Statement on Engineering Expertise on Shift" (GL 86-04) to be applied to the STA position at the DBNPS. The proposed change will allow one of the two required individuals filling the SRO positions to also fill the STA position provided the individual meets the qualifications for the combined SRO/STA position specified for Option 1 of the policy statement. In addition, the option for continued use of the dedicated STA position is retained. Allowance is provided in the proposed change for using either option on each shift.

The qualifications for the dual-role SRO/STA described for Option 1 in the Commission's Policy Statement on Engineering Expertise on shift are as follows:

a. Licensed as a SRO at assigned unit.

b. Meets the STA training criteria of NUREG-0737, Item 1.A.1.1, and one of the following educational alternatives:

1) Bachelor's degree in engineering from an accredited institution;

2) Professional Engineer's (PE's) License obtained by the successful completion of the PE examination,

3) Bachelor's degree in Engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences; or

4) Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

The proposed TS change will allow an individual with an SRO license at DBNPS (who meets the qualifications to be an STA) to also be the required STA on shift; therefore, the Option 1 qualification requirement to have an SRO license will be met.

The DBNPS STA training program is accredited by the Institute of Nuclear Power Operations (INPO). The training an individual will receive to become a dual-role SRO/STA will meet the STA training criteria of NUREG-0737, Item 1.A.1.1. Therefore, the Option 1 training qualification will be fulfilled by the individual performing the dual-role SRO/STA function allowed by this proposed TS revision. In addition, one of the educational alternatives of the policy statement will be met by an individual performing the SRO/STA function.

With the proposed change, DBNPS operating shift personnel will continue to have the expertise on shift to recognize and effectively deal with plant transients or other abnormal conditions. Greater flexibility for meeting shift manning requirements will also result from the proposed change.

Based on the above, it is determined that the proposed change is administrative in nature and has no detrimental effect on safety.

SIGNIFICANT HAZARDS CONSIDERATION:

The NRC has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed change and determined that a significant hazards consideration does not exist because operation of the DBNPS, Unit Number 1, in accordance with this change would:

1a. Not involve a significant increase in the probability of an accident previously evaluated because no accident initiators or assumptions are affected. The analyses of accidents that concern operator error, do not take credit for the STA as decreasing the probability of occurrence of these accidents. The proposed amendment simply provides flexibility in meeting an administrative requirement and does not involve any modifications or changes in the plant.

1b. Not involve a significant increase in the consequences of an accident previously evaluated because no accident conditions or assumptions are affected. With the proposed changes, shift personnel will continue to have the expertise to recognize and effectively deal with plant transients or other abnormal events. The analyses of accidents do not take credit for the STA as mitigating the consequences of these accidents. The proposed change is administrative. The expertise of the operating shift is not jeopardized and the radiological consequences of any evaluated accident remain unchanged.

2a. Not create the possibility of a new kind of accident from any accident previously evaluated because no accident initiators are created. The proposed change does not involve any modifications or changes in the plant. This is an administrative change in which the ability of the operating shift is not jeopardized. Since the STA has no operational responsibilities or duties on shift other than those associated with plant transients and accidents, combining the STA position with the SRO function will not introduce any new opportunity for operator error to occur.

2b. Not create the possibility of a different kind of accident from any accident previously evaluated because the administrative change has no effect on plant systems, accident initiators or accident assumptions. The change does not affect any system functional requirements, plant maintenance, or operability requirements.

3. Not involve a significant reduction in a margin of safety. The proposed change will not have any significant effect on safety limits, boundary performance or system performance. The STA or SRO/STA will continue to provide engineering and accident assessment expertise on shift. The training, experience, and expertise on shift to analyze, assess, and evaluate plant transients and accidents will not be diminished.

CONCLUSION:

On the basis of the above, Toledo Edison has determined that the LAR does not involve a significant hazards consideration. As this LAR concerns a proposed change to the Facility Operating License that must be reviewed by the NRC, this LAR does not constitute an unreviewed safety question.

ATTACHMENT:

Attached is the proposed marked-up change to the Operating License.