

FEBRUARY 22 1983

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Docket File

DMB 016

Docket No. 50-346

Mr. Richard P. Crouse
Vice President, Nuclear
Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

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Dear Mr. Crouse:

SUBJECT: EXEMPTION REQUEST - VESSEL HEAD VENTS

By letter dated July 1, 1982 (No. 835), Toledo Edison Company requested an exemption from certain requirements of 10 CFR 50.44(c)(3)(iii) for the Davis-Besse Nuclear Power Station, Unit No. 1. Specifically, relief from the requirement to install a reactor vessel head vent was requested.

We have reviewed your exemption request and the information submitted with your January 30, 1980 (No. 582) letter which you referenced in the July 1, 1982 letter. We understand that you contend that a reactor vessel head vent is not required because noncondensable gases that might accumulate in the upper part of the reactor vessel can be vented safely using the hot leg high point vents only. We find, however, that the lack of integral system test data supporting your contention and the lack of a verified code capable of treating noncondensable gas in contact with steam-water mixtures prevents us from concluding that an exemption can be justified.

We believe that such an exemption can be justified only if the ability to safely vent noncondensable gas trapped under the vessel head using hot leg vents is demonstrated. We consider that an acceptable demonstration must be based upon either experiments conducted in an appropriate test facility to verify analytical methods and operating procedures or a simulator. The simulator, however, must be verified with appropriate integral system test data.

By letter to the NRC dated January 13, 1983, the Babcock and Wilcox Owners Group committed to participate in an integral system test program which you endorsed. The program definition still needs to be developed; and the letter indicates a schedule to begin testing during the first half of 1985. We believe that testing to demonstrate the ability to safely vent noncondensable gas in the vessel head can be performed acceptably in this facility, either in its present configuration or with the proposed modifications.

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A final determination for granting a full-term exemption must necessarily depend upon a successful demonstration. Therefore, only interim relief from the implementation schedule for head vent installation can be considered at this time. For the NRC to consider the granting of an exemption extending the implementation deadline, we require the following information:

1. A commitment to perform the necessary integral system testing which demonstrates the efficacy of your proposed method of noncondensable gas removal from the reactor vessel head.
2. A realistic schedule for the submittal of your evaluation of the test results which will verify analytical methods and operating procedures described herein.
3. A commitment that, prior to startup from the next scheduled refueling, the hot leg vents will have been installed and declared operable, procedures will be in place and operators will have been trained for using the high point vents to vent noncondensable gas trapped in the reactor vessel.
4. Your Safety Analysis regarding the interim use of the above procedures for a period of time needed to conduct and evaluate the necessary integral testing program results, but not less than four years.

Please reply in fifteen days from the date of this letter regarding your schedule for submitting the information requested.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,
Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

cc:
See next page

*See previous white for concurrences.

No legal objection
MM

D. G. Eisenhut
2/2/83

OFFICE	ORB #4:DL	ORB #4:DL	C-ORB #4:DL	OELD	D:DSI	C-RSB:DSI	AD:OR:DL
SURNAME	R Ingram*	A De Biasio; cf. J Stolz*		M. Rothschild	RMattson*	BSheron *	Glainas
DATE	2/2/83	2/9/83	2/3/83	2/15/83	2/8/83	2/7/83	2/17/83

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The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

Gus C. Lainas, Assistant Director
for Operating Reactors
Division of Licensing

cc:
See next page

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GLainas
2/ /83

OFFICE ▶	ORB#4:DL	ORB#4:DL	G-ORB#4:DL	OELD	D:DSI	C-RSBA/BSI
SURNAME ▶	RIngram	ADe Agazio;cf	JSto		RMattson	BSheron
DATE ▶	2/2/83	2/3/83	2/3/83	2/ /83	2/8/83	2/7/83

Toledo Edison Company

cc w/enclosure(s):

Mr. Donald H. Hauser, Esq.
The Cleveland Electric
Illuminating Company
P. O. Box 5000
Cleveland, Ohio 44101

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
5503 N. State Route 2
Oak Harbor, Ohio 43449

Gerald Charnoff, Esq.
Shaw, Pittman, Potts
and Trowbridge
1800 M Street, N.W.
Washington, D. C. 20036

Paul M. Smart, Esq.
Fuller & Henry
300 Madison Avenue
P. O. Box 2088
Toledo, Ohio 43603

Regional Radiation Representative
EPA Region V
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
7910 Woodmont Avenue, Suite 220
Bethesda, Maryland 20814

Ohio Department of Health
ATTN: Radiological Health
Program Director
P. O. Box 118
Columbus, Ohio 43216

President, Board of County
Commissioners of Ottawa County
Port Clinton, Ohio 43452

Attorney General
Department of Attorney General
30 East Broad Street
Columbus, Ohio 43215

Harold Kahn, Staff Scientist
Power Siting Commission
361 East Broad Street
Columbus, Ohio 43216

Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Mr. Larry D. Young
Manager, Nuclear Licensing
Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652