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Docket Number 50-346

License Number NPF-3

Serial Number 2026

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United States Nuclear Regulatory Commission
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Subject: License Amendment Application to Revise Technical
Specification Regarding Reactor Coolant System Venting
Requirements

Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit 1 Operating License Number NPF-3, Appendix A, Technical Specifications (TS) to reflect the changes attached. The proposed changes involve TS 3.4.11, Reactor Coolant System - Reactor Coolant System Vents, and TS 6.9.2, Reporting Requirements - Special Reports.

Technical Specification 3.4.11 currently requires that three reactor coolant system vent paths shall be operable: a.) Reactor Coolant System Loop 1 with vent path through valves RC 4608A and RC 4608B; b.) Reactor Coolant System Loop 2 with vent path through valves RC 4610A and RC 4610B; and c.) Pressurizer with vent path through either valves RC 11 and RC 2A (PORV), or valves RC 239A and RC 200. Technical Specification Action 3.4.11.a currently states "With one of the above vent paths inoperable, restore the inoperable vent path to OPERABLE status within 30 days, or, be in HOT STANDBY within six hours and in HOT SHUTDOWN within the following 30 hours."

The proposed change to TS 3.4.11 would revise the Action statement to allow continued operation in the event that either the RCS Loop 1 vent path or the RCS Loop 2 vent path (but not both) is inoperable and cannot be restored to operable status within 30 days. Under this scenario, in lieu of a plant shutdown, a Special Report would be prepared and submitted to the NRC pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of

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inoperability, and the plans and schedule for restoring the vent path to OPERABLE status. A plant shutdown would continue to be required in the event the pressurizer vent path is inoperable for longer than 30 days. Current Actions b, c, and d would be unchanged with the exception that they would be redesignated as Actions c, d, and e, respectively.

Technical Specification 6.9.2 summarizes the Special Reports required to be submitted to the NRC. The above described proposed change to TS 3.4.11 would add a new Special Report requirement, which would require a new item entry to TS 6.9.2. This is an administrative change.

A similarly worded license amendment was approved by the NRC and issued on May 8, 1989 for the Florida Power Corporation Crystal River Unit 3 Nuclear Generating Plant (Docket No. 50-302, Amendment No. 112 to License No. DPR-72).

A recent containment entry identified the RCS Loop 2 vent path through valves RC 4610A and RC 4610B as a potential source of increased RCS leakage. To minimize RCS leakage, this flow path was isolated by unlocking and closing upstream manual valve RC 44. The vent path was declared inoperable and the associated TS LCO 3.4.11.a Action statement was entered. As noted above, the current wording of this Action statement allows 30 days to restore the vent path to operable status. Following expiration of the 30 day allowed outage time at 1118 hours on March 31, 1992, a plant shutdown will be required to commence.

Toledo Edison estimates that the repair work on these two valves would require a duration of 80 hours working around-the-clock. However, due to the need to be in Cold Shutdown (Mode 5) to perform the work and the associated Mode change testing requirements, Toledo Edison estimates that a forced outage would have a total outage duration (breaker to breaker) of approximately 14.8 days.

The RCS loop vent path valves RC 4608A, 4608B, 4610A, and 4610B are solenoid-operated globe valves manufactured by Valcor Engineering Corporation. These valves are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI (1986) "Category B" valves - valves for which seat leakage in the closed position is inconsequential for fulfillment of their function. The valves are stroke tested, however, a valve leak rate test is not required since these valves are classified as Category B. These valves have leaked in the past, however, the leakage could be corrected by cycling the valves, or by allowing the valves to seat themselves over time. A slight leakage from the RCS Loop 2 vent path discharge (one drip every several minutes) was observed on November 6, 1991, and a Work Request was initiated. However, since the leak rate was insignificant, the Work Request was closed, and no significant leakage was attributed to these valves during plant startup.

Toledo Edison plans to attempt to reseal the leaking valves (RC 4610A and RC 4610B). A procedure is currently being developed to stroke the valves and to assess leakage. The procedure will be performed prior

to expiration of the 30 day allowed outage time. If the leakage can be corrected, the RCS Loop vent path will be restored to operable status, and Toledo Edison will not require this change to be processed as an exigent or emergency Technical Specification change.

If the NRC approves this request, Toledo Edison will remain within the Action statement until the valves are returned to an operable status. This entry will be tracked to ensure operators are acutely aware of the inoperability of one of the vent paths. The Technical Specifications will continue to require that the plant be in Hot Standby (Mode 3) within the next six hours, if a second vent path becomes inoperable and cannot be restored within seventy-two hours. These compensatory measures will remain in effect until the plant enters a mode of operation where the Technical Specification no longer applies or until the valves are restored to an operable status.

As discussed in the enclosed Safety Assessment and Significant Hazards Consideration, Toledo Edison has evaluated the appropriateness of a plant shutdown due to a single inoperable RCS loop vent path and concluded that such a forced shutdown is unwarranted.

In order to avoid this unwarranted plant shutdown and pending the results of valve stroking and leakage assessment, Toledo Edison requests that this license amendment application be processed in the manner allowed by 10CFR50.91(a) for exigent circumstances. Should there not be enough time for the NRC to process this amendment application as an exigent request, then Toledo Edison requests that the NRC process it as an emergency license amendment.

Toledo Edison has performed the attached environmental assessment and determined that the proposed amendment, if approved by the NRC, will have no significant impact on the environment.

The State of Ohio is being transmitted a copy of this License Amendment Application by express mail to ensure an opportunity for State review and comment.

In summary, Toledo Edison requests that this amendment be issued by the NRC by March 30, 1992, in order to avoid a potential forced plant shutdown on March 31, 1992. Should Toledo Edison efforts be successful to correct the leakage so that the manual valve in the RCS loop vent path can be reopened prior to the expiration of the 30 day allowed outage time, Toledo Edison will notify the NRC not to continue processing this request on an exigent or emergency basis.

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Should further information be required, please contact
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Very truly yours,



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