

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NO. NPF-3
FOR
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NO. 1

Enclosed are forty-three (43) copies of the requested changes to the Davis-Besse Nuclear Power Station Unit No. 1 Facility Operating License No. NPF-3, together with the Safety Evaluation for the requested change.

The proposed changes include Section 6.2.3.

By /s/ R. P. Crouse
Vice President, Nuclear

Sworn and subscribed before me this 8th day of October, 1984.

/s/ Laurie A. Hinkle, nee (Brudzinski)
Notary Public, State of Ohio
My Commission Expires May 16, 1986

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Docket No. 50-346
License No. NPF-3
Serial No. 1087
October 8, 1984

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A
Technical Specifications

Section 6.2.3

- A. Time required to Implement. This change is to be effective upon NRC approval.
- B. Reason for Change (Facility Change Request 84-100).
Response to Mr. J. F. Stolz letter of February 8, 1984 (Log No. 1445) requesting Technical Specification on NUREG 0737, Item I.A.1.3.1, Limit Overtime.
- C. Safety Evaluation
(See Attached)
- D. Significant Hazard Consideration
(See Attached)

SAFETY EVALUATION

This amendment request to the Technical Specifications (add Section 6.2.3) to include limits on working hours of facility staff who perform safety related functions. The safety function of the Section 6.2.3 is to ensure safe plant operation by requiring limitations on overtime of key personnel at Davis-Besse Unit 1.

The Technical Specification as proposed will limit any key operation or maintenance individuals to work:

- a. Not more than 16 hours straight (excluding shift turnover time).
- b. Not more than 16 hours in a 24-hour period, 24 hours in a 48-hour period, or 72 hours in a seven day period (all excluding shift turnover time).
- c. With a break of at least eight hours between work periods (including shift turnover time).
- d. Overtime on an individual basis and not on an entire staff basis (except during extended shutdown periods).

This new Technical Specification is requested by the NRC through Generic Letter 82-12 which contains the NRC's interpretation for the resolution of NUREG 0737, Item I.A.1.3.1 (Limit Overtime).

The proposed Technical Specification recognizes the need for personnel overtime, while at the same time limiting the excessive use of overtime so that potential human errors that may be caused by fatigue can be prevented. The safety function of the Technical Specifications is not being degraded.

Therefore, based on the above, this is not an unreviewed safety question.

SIGNIFICANT HAZARD CONSIDERATION

This amendment request to include the limit on overtime for facility staff who perform safety related functions does not represent a significant hazard.

The proposed amendment request is in response to a request from the NRC to limit overtime (NUREG 0737, Item I.A.1.3.1) for facility staff who perform safety related functions. The revision to the Technical Specifications would assure that qualified plant personnel to man the operational shifts are readily available in the event of an abnormal or emergency situation. Toledo Edison has established administrative procedures encompassing the below NUREG guidelines.

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, including shift turnover time.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards considerations related to a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications: for example, a more stringent surveillance requirement. (example ii)

The amendment request is an additional restriction not covered in the license present Technical Specifications. This requirement ensures safe plant operation by requiring limitation on overtime of key personnel so that potential human errors that may be caused by fatigue can be prevented.

Based on the above information, this amendment request would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Therefore, based on the above, the requested license amendment does not present a Significant Hazard.