

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 incorporate the Integrated Living Schedule Plan into the license.

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

Sworn and subscribed before me this 4th day of August, 1984.

/s/ Nora Lynn Flood  
Notary Public

S E A L

My commission expires Sept. 1, 1987.

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Docket No. 50-346  
License No. NPF-3  
Serial No. 1061  
August 4, 1984

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, License NPF-3 to Incorporate the Integrated Living Schedule Plan

- A. Time required to Implement. This change is to be effective upon NRC approval.
- B. Reason for Change (Facility Change Request 84-082)

The proposed amendment request would: 1) optimize the allocation of TED and NRC resources among those activities necessary to assure the continued safe, reliable and economic operation of Davis-Besse; and 2) achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities, thereby providing a rational basis for planning, scheduling and implementing necessary plant betterment projects at the Davis-Besse Nuclear Power Station.

- C. Safety Evaluation  
(See Attached)
- D. Significant Hazard Consideration  
(See Attached)

Davis-Besse Power Station Unit No. 1  
Proposed License Amendment

1. The "Davis-Besse Nuclear Power Station Integrated Living Schedule Program Plan" (The Plan) submitted on July 16, 1984 (Serial No. 1043) is approved.
  - a) The Plan shall be followed by the licensee from and after the effective date of this amendment.
  - b) The licensee is required to maintain current revisions of, and provide reports regarding, schedules associated with the Plan in accordance with the terms of the Plan and failure to do so shall constitute a violation of this license condition.
  - c) Completion dates for Category A projects shall be changed only in accordance with applicable NRC procedures. Changes to dates for Categories B, C and D projects do not require a license amendment. Failure to complete items listed in the Implementation Schedule or Long-Range Plan in accordance with dates there specified shall not constitute a violation of this license condition, but may constitute a violation of a specific regulation, order or license condition imposing such date.
2. This license amendment shall be effective until (Date will be set for a 2 year effective period), subject to renewal upon application by the licensee.
3. This license amendment is effective as of the date of issuance.

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## SAFETY EVALUATION

This amendment request is to incorporate the Integrated Living Schedule Program (ILSP) into the Davis-Besse Nuclear Power Station Unit No. 1 Operating License (NFP-3). The ILSP by itself has no safety function, but it has an effect on the safety function of other systems and/or components at Davis-Besse.

Prior to the establishment of the concept of the ILSP and Prioritization Subcommittee, there was no formalized methodology to achieve an appropriate balance between the NRC and TED initiated activities. The ILSP will establish a rational basis for planning, scheduling and implementing necessary plant betterment projects. This program by the Nuclear Mission initiates a single integrated system for budget, project management, planning and scheduling of plant improvements or modifications.

The primary objectives of the ILSP Plan are:

- 1) To optimize the allocation of TED and NRC resources to those activities necessary to assure safe, reliable and economic operation of Davis-Besse.
- 2) To achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities. This will provide consistent and defensible basis for planning, scheduling and implementing necessary plant betterment projects at Davis-Besse.

The Plan is divided into four categories of activities (A-D). They are as follows:

- 1) Category A - Activities that have implementation dates mandated by NRC rules, orders or license conditions.

Scheduled completion dates for Category A items, whether in the Implementation Schedule or the Long-Range Plan will be modified only upon receipt of prior approval from the NRC, in accordance with applicable NRC regulations.

- 2) Category B - Davis-Besse specific NRC requirements that are not in Category A, but have been budgeted and included in the Implementation Schedule.

TED will inform its NRR Project Manager when a change is made to the schedule completion date for a Category B item. TED will provide the NRC with written notification of a change including the basis for the change and any compensatory action initiated.

- 3) Category C - TED identified plant betterment activities that are included in the Implementation Schedule or Long-Range Plan.

As part of the semi-annual update of the Implementation Schedule and Long-Range Plan, TED will advise the NRC of changes to Category C items. With the exception of the situation indicated below, prior notification to the NRR Project Manager of changes to items in this category will not be required.

If, however, TED modifies a Category C item that has been included in the Implementation Schedule, that was previously the basis for modifying the completion date for a Category A item, TED will inform the NRR Project Manager consistent with the guidance stated previously for Category B items.

- 4) Category D - Davis-Besse specific NRC requirements that are not budgeted, but are included in the Long-Range Plan.

As part of the semi-annual update of the Long-Range Plan, TED will advise the NRC of changes to Category D items. No prior notification to the NRR Project Manager of changes to items in this Category will be required. If after the semi-annual review the NRC desires additional information, such discussions will be initiated with the NRR Project Manager. However, all changes in Category D scheduled dates will be effective immediately and will remain so, unless subsequently modified by TED.

The ILSP by itself has no safety function, but it will have an effect on the safety function of other systems and/or components at Davis-Besse. The system and/or components safety function will be enhanced by the ILSP process. The ILSP process has a basis which is cognizant of safety, regulatory, reliability, operability and economic factors. This ensures that any modifications will not adversely affect the public health and safety. Therefore, this is not a unreviewed safety question.



### No Significant Hazard Consideration

The attached amendment request to incorporate the Integrated Living Schedule Program (ILSP) into the Davis-Besse Operating License (NPF-3) does not represent a Significant Hazard. The purpose of this "Plan" is to establish, within the ILSP framework, a rational basis upon which TED and the NRC will fulfill specific responsibility as related to the Davis-Besse Nuclear Power Station.

The primary objectives of the ILSP Plan are:

- 1) To optimize the allocation of TED and NRC resources to those activities necessary to assure safe, reliable and economic operation of Davis-Besse.
- 2) To achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities. This will provide consistent and defensible basis for planning, scheduling and implementing necessary plant betterment projects at Davis-Besse.

The Plan is divided into four categories of activities (A-D). They are as follows:

- 1) Category A - Activities that have implementation dates mandated by NRC rules, orders or license conditions.

Scheduled completion dates for Category A items, whether in the Implementation Schedule or the Long-Range Plan will be modified only upon receipt of prior approval from the NRC, in accordance with applicable NRC regulations.

- 2) Category B - Davis-Besse specific NRC requirements that are not in Category A, but have been budgeted and included in the Implementation Schedule.

TED will inform its NRR Project Manager when a change is made to the schedule completion date for a Category B item. TED will provide the NRC with written notification of a change including the basis for the change and any compensatory action initiated.

- 3) Category C - TED identified plant betterment activities that are included in the Implementation Schedule or Long-Range Plan.

As part of the semi-annual update of the Implementation Schedule and Long-Range Plan, TED will advise the NRC of changes to Category C items. With the exception of the situation indicated below, prior notification to the NRR Project Manager of changes to items in this category will not be required.

If, however, TED modifies a Category C item that has been included in the Implementation Schedule, that was previously the basis for modifying the completion date for a Category A item, TED will inform the NRR Project Manager consistent with the guidance stated previously for Category B items.

- 4) Category D - Davis-Besse specific NRC requirements that are not budgeted, but are included in the Long-Range Plan.

As part of the semi-annual update of the Long-Range Plan, TED will advise the NRC of changes to Category D items. No prior notification to the NRR Project Manager of changes to items in this Category will be required. If after the semi-annual review the NRC desires additional information, such discussions will be initiated with the NRR Project Manager. However, all changes in Category D scheduled dates will be effective immediately and will remain so, unless subsequently modified by TED.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards is 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)

Although the example cited above is for the Technical Specification the request is for a license condition not presently included in Davis-Besse license. The amendment to the license will require the Licensee to maintain semi-annual revisions of, and maintain documentation regarding modifications to the schedules associated with the Plan in accordance with the terms of the Plan and failure to do so shall constitute a violation of this license condition.

Completion dates for Category A projects shall be changed only in accordance with applicable NRC procedures. Changes to dates for Categories B, C and D projects do not require a license amendment. Failure to complete items listed in the Implementation Schedule or Long-Range Plan in accordance with dates there specified shall not constitute a violation of this license condition, but may constitute a violation of a specific regulation, order or license condition imposing such date.

Based on the above information and attached Safety Evaluation, 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.