

November 22, 1995

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Mr. John P. Stetz
 Vice President- Nuclear
 Centerior Service Company
 c/o Toledo Edison Company
 Davis-Besse Nuclear Power Station
 5501 North State Route 2
 Oak Harbor, OH 43449

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR TECHNICAL SPECIFICATION
 SUBMITTAL ON INCREASING THE ALLOWED OUTAGE TIME OF A.C. POWER
 SOURCES FOR FACILITY OPERATING LICENSE NO. NPF-3 - DAVIS-BESSE
 NUCLEAR POWER STATION, UNIT NO. 1 (TAC NO. M92532)

Dear Mr. Stetz:

By letter dated June 1, 1995, Toledo Edison Company requested a Technical Specification change to revise the allowed outage time (AOT) in Technical Specification 3.8.1.1 - A.C. Power Sources, Operating from 72 hours to 7 days when one out of the two emergency diesel generators (EDG) is inoperable. The change also modifies Bases 3.0.5 to reflect the proposed 7 day EDG AOT. The staff has completed its preliminary review of your submittal. On the basis of our review, we have determined that there are outstanding areas which require greater clarification. The specific questions are provided in the enclosure.

You requested the amendment associated with this request by December 1, 1995. As I have discussed with you, we will not be able to meet this date. We request that you provide your responses to the enclosed questions by December 13, 1995. If these responses are complete and the staff review determines that the plant can be operated safely, then the license amendment would be issued by January 30, 1996. I encourage you to contact me if you have any questions about the request for additional information. I apologize for any inconvenience this delay in schedule has caused.

Sincerely,

Original signed by:

Linda L. Gundrum, Project Manager
 Project Directorate III-3
 Division of Reactor Projects III/IV
 Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request For Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 22, 1995

Mr. John P. Stetz
Vice President - Nuclear
Centerior Service Company
c/o Toledo Edison Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449

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Linda L. Gundrum, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-346

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cc w/encl: See next page

Mr. John P. Stetz
Toledo Edison Company

cc:

Mary E. O'Reilly
Centerior Energy Corporation
300 Madison Avenue
Toledo, Ohio 43652

Manager - Regulatory Affairs
Toledo Edison Company
Davis-Besse Nuclear Power Plant
5501 North State - Route 2
Oak Harbor, Ohio 43449

Gerald Charnoff, Esq.
Shaw, Pittman, Potts
and Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60523-4351

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
1700 Rockville Pike, Suite 525
Rockville, Maryland 20852

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

Mr. John K. Wood, Plant Manager
Toledo Edison Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, Ohio 43449

Davis-Besse Nuclear Power Station
Unit No. 1

Robert E. Owen, Chief
Bureau of Radiological Health
Service
Ohio Department of Health
P. O. Box 118
Columbus, Ohio 43266-0118

Attorney General
Department of Attorney
General
30 East Broad Street
Columbus, Ohio 43216

Mr. James W. Harris, Director
Division of Power Generation
Ohio Department of Industrial
Regulations
P. O. Box 825
Columbus, Ohio 43216

Ohio Environmental Protection Agency
DERR--Compliance Unit
ATTN: Zack A. Clayton
P. O. Box 1049
Columbus, Ohio 43266-0149

State of Ohio
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Mr. James R. Williams
State Liaison to the NRC
Adjutant General's Department
Office of Emergency Management Agency
2825 West Granville Road
Columbus, Ohio 43235-2712

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

DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1
DOCKET NO. 50-346
REQUEST FOR ADDITIONAL INFORMATION -
THE ALLOWED OUTAGE TIME FOR A.C. POWER SOURCES
(TAC NO. M92532)

In your submittal of June 1, 1995, you proposed to extend the allowed outage time (AOT) from 3 days to 7 days for each emergency diesel generator (EDG) in order to perform preventive maintenance (PM) or corrective maintenance (CM). The NRC staff has been considering the extensions of the EDG AOT on a plant-specific basis if the primary intent of the extending EDG AOT is to perform the manufacturer-recommended maintenance such as tear-downs or preplanned preventive maintenance or modifications that would otherwise extend beyond the original AOT. Please address the following issues for the Davis-Besse Nuclear Power Station (DBNPS).

1. In your submittal of June 1, 1995 you stated that the transfer of a 13.8 kv bus between the three sources (i.e., three 345 kv lines) can be accomplished either manually or automatically. However, DBNPS Updated Final Safety Analysis Report (USAR) Section 8.3.1.1.2 states that automatic transfer occurs only from the normal to the reserve sources (i.e., the startup transformers) or between the two reserve power sources; the transfer from either of the startup transformers to the unit auxiliary transformer can only be done manually. Please describe how the third 345 kv power source (i.e., the unit auxiliary transformer) would become available to supply the 13.8 kv buses automatically in the event that both startup transformers would become inoperable. If the transfer can only be performed manually please provide an estimate of the time necessary to provide power to the 13.8 kv buses. Would the subject transfer be available in sufficient time following a loss of all onsite alternating current power supplies and the other offsite electric power circuits, to assure that specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded?
2. The staff is presently concerned that the extensions of EDG AOTs may increase the mean core damage frequency (CDF) for the station blackout (SBO) events, and impact its resolution. Provide the calculated CDF for SBO sequences without the extended allowed outage time (AOT), and the CDF for SBO sequences with the extended AOT. Also provide the overall unavailability of the EDGs used to calculate the CDFs for the SBO sequences requested.
3. Provide a discussion of the loss of offsite power events at your facility and include a quantitative discussion on how industry data on offsite power losses is compared with your facility. Also, provide the major electrical component (i.e., buses, transformers, breakers and EDG) failure rates for the onsite and offsite power sources which were reviewed in the safety assessment.
4. Given that the majority of the 7-day AOT is required for the 6-year EDG surveillance/inspection (as opposed to the 18-month or 3-year inspection) would a more appropriate proposal for Davis-Besse be a 7-day AOT for the 6-year EDG inspection, and a 3-day AOT for other required maintenance and/or inspections? If not, why not?

5. The staff has recently granted an extension of an AOT to a plant that has installed a weather-protected tie-line from a hydro station used as an AAC source which will be substituted for the inoperable EDG during the extension. The extension was granted provided the certain conditions were met. As part of the rationale for the extended AOT change you credit the use of the Station Blackout Diesel Generator (SBODG). Please address each of the points below.
- a. In your submittal of June 1, 1995 you state that an accident analysis shows that the loss of all A.C. power does not result in excessive pressure in the Reactor Coolant System (RCS) and the natural circulation characteristics of the RCS will assure core decay heat removal and a minimum core DNBR greater than 1.30. Given the above analysis and the use of the SBODG during postulated accidents please identify the operating procedures and the actions necessary to connect the SBODG to the essential buses in the event of a loss of offsite power and the failure of the other EDG.
 - b. During the special safety inspection (reference NRC Inspection Report No. 50-346/93019) conducted on the implementation of the Station Blackout Rule at Davis-Besse the team identified a concern regarding the DC ground detection system for the SBODG. The detection system may not detect high resistance or multiple grounds. These grounds could impact the operation of affected control circuits such that operators may be able to start the diesel generator. Identify efforts to address this 1993 inspection observation.
 - c. Removal from service of safety systems and important non-safety equipment, including offsite power sources, should be minimized during the EDG PM period. Why not identify this prerequisite in the revision to TS Bases 3.0.5?
 - d. Voluntary entry into an LCO action statement should not be scheduled when adverse weather is expected. Why not identify this prerequisite in the revision to TS Bases 3.0.5?
 - e. If the SBODG will be utilized during the EDG PM period, the TS should contain requirements to demonstrate, before taking an EDG out for an extended period, that the SBODG is functional by verifying that the power source is capable of being connected to the safety bus associated with the inoperable EDG, and by verifying this capability of being connected to the safety bus every 8 hours thereafter. Please identify what means will ensure that the SBODG will be operational and functional during the EDG PM period.
6. In your submittal of June 1, 1995, your rationale for the proposed change cited the use of the SBODG and positive control of maintenance planning and scheduling activities. Please explain why the proposed revision to TS Bases 3.0.5 do not reflect the above rationale.