

300 Madison Avenue
Toledo, OH 43652-0001
419-249-2300

John P. Stetz
Vice President - Nuclear
Davis-Besse

Docket Number 50-346

License Number NPF-3

Serial Number 2337

December 12, 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: License Amendment Application to Revise Technical Specifications
Regarding Containment Systems

Ladies and Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications. The proposed changes involve Technical Specification (TS) 3/4.6.1.1, Containment Systems - Primary Containment - Containment Integrity, TS 3/4.6.1.2, Containment Systems - Containment Leakage, TS 3/4.6.1.6, Containment Systems - Containment Vessel Structural Integrity, TS 3/4.6.5.3, Containment Systems - Shield Building Structural Integrity, and associated TS Bases.

On October 26, 1995, a final NRC rule implementing a performance-oriented and risk-based approach to containment leakage testing became effective. This approach is identified as "Option B" of Appendix J to 10 CFR Part 50. The rule redesignates the previous prescriptive requirements as "Option A" and allows licensees the option of following either set of requirements. The rule requires licensees to submit a license amendment application and to obtain NRC approval of the application prior to actual adoption of Option B or parts thereof.

In accordance with the rule implementation requirements, the enclosed license amendment application proposes the necessary Technical Specification changes to partially adopt the new Option B approach. The Option B approach would be limited at this time to Type A testing. It is anticipated that adoption of the Option B approach for Type B and C testing will be proposed at a later date, as plant resources allow.

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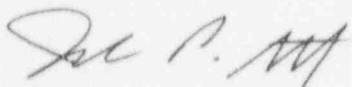
Toledo Edison recognizes that model Technical Specifications are being developed for the final rule as part of a joint NRC/industry effort. However, the draft model Technical Specifications which are presently available are oriented towards plants which have adopted the improved Standard Technical Specifications and which are ready to adopt the Option B approach for Type A, B, and C testing. As described below, Toledo Edison schedule requirements do not permit withholding submittal of this license amendment application until model Technical Specifications are finalized and issued. However, Toledo Edison intends to configure the applicable DENPS Technical Specifications to more closely follow the guidance of the finalized model Technical Specifications when the follow-up license amendment application to adopt the Option B approach for Type B and C testing is submitted at a later date.

Absent an exemption to the test frequency requirements of Option A of Appendix J to 10 CFR 50, NRC approval of this license amendment application is necessary in order to avoid the need to perform an unnecessary Type A test during the upcoming Tenth Refueling Outage (10RFO), which is currently scheduled to commence on April 8, 1995. Accordingly, it is requested that this amendment be issued by the NRC by March 8, 1996. Although this requested approval date allows a shorter than usual time for NRC processing of the request, Toledo Edison could not submit the application until the rule became final and it could be evaluated for application at the DBNPS. Toledo Edison believes that a license amendment is preferable to the alternative, an exemption request.

These changes are being submitted to the NRC as a Cost Beneficial Licensing Action. As demonstrated in the enclosed license amendment application, these changes will not adversely impact safety. The proposed changes will provide a cost savings well in excess of \$100,000 over the DBNPS's remaining life.

Should you have any questions or require additional information, please contact Mr. Peter W. Smith, acting Manager - Regulatory Affairs, at (419) 249-2356.

Very truly yours,



MKL/laj

Enclosure

cc: L. L. Gundrum, NRC/NRR Project Manager
H. J. Miller, Regional Administrator, NRC Region III
S. Stasek, NRC Region III, DB-1 Senior Resident Inspector
J. R. Williams, Chief of Staff, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board