

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 6.9.1.6.

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

Sworn and subscribed before me this 17th day of September, 1984.

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

S E A L

8409250359 840917  
PDR ADOCK 05000346  
P PDR

Docket No. 50-346  
License No. NPF-3  
Serial No. 1082  
September 17, 1984

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A  
Technical Specifications Section 6.9.1.6.

A. Time required to Implement. This change is to be effective upon NRC approval.

B. Reason for Change (Facility Change Request 84-063 Rev. A).

To comply with NRC request dated February 8, 1984 (Log No. 1446) to report challenges to reactor coolant safety and relief valves which are not covered by Technical Specifications or Licensee Event Reports.

C. Safety Evaluation  
(See Attached)

D. Significant Hazard Consideration  
(See Attached)

## SAFETY EVALUATION

This amendment request is to incorporate into the monthly operating report requirements of the Technical Specification, Section 6.9.1.6 (Administrative Controls) to include the reporting of challenges to the Pressurizer Power Operated Valve (PORV) and the Pressurizer Code Safety Valves (CSV).

The safety function of Technical Specifications is to provide safe operating conditions and surveillance requirements for the plant and public safety, and the safety function of Section 6.9.1.6 is to provide monthly operating report of operating statistics and shutdown experience. At present, the technical specification section 6.9.1.6 does not cover reporting of challenges to the pressurizer PORV and CSV. Also, under the revised Licensee Event Reporting System (10CFR50.73) challenges of the PORV and CSV are not reported. To comply with the NRC request dated February 8, 1984 (Log No. 1446), reportability of challenges to the pressurizer PORV and CSV will be included in the monthly operating report.

Since the safety function of the Technical Specification has not been degraded by the proposed change, no unreviewed safety question is involved.

### SIGNIFICANT HAZARD CONSIDERATION

The proposed amendment request to add the requirement to report challenges to reactor coolant safety and relief valves does not represent a Significant Hazard.

Toledo Edison was requested by a letter from the NRC dated February 8, 1984 (Log No. 1446) to submit an amendment for the reporting of challenges to reactor coolant safety and relief valves. The NRC requested this change as our present Technical Specifications only require reporting failure of safety and relief valves. The new rule (10CFR50.73) that modifies the Licensee Event Report system does not require reporting of challenges to safety and relief valves. By the addition to section 6.9.1.6 (monthly operating report) Toledo Edison will ensure that all challenges to the safety and relief valves will be reported.

The Commission has provided examples of amendments which are not likely to involve a significant hazards consideration (48 FR 14870). Such as 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). Toledo Edison at present does not have the proposed requirement for monthly reporting of challenges to reactor coolant safety and relief valves. The challenges will be reported in the Monthly Operating Report that is submitted to the Director, Office of Management and Program Analysis and a copy to the Regional Office.

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.

cj a/5