



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION
TECHNICAL SPECIFICATION CHANGE REQUEST
FACILITY OPERATING LICENSE NO. NPF-3
TOLEDO EDISON COMPANY
AND
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1
DOCKET NO. 50-346

Introduction

By letter dated November 5, 1982 and modified by letters dated July 1 and August 18, 1983, Toledo Edison Company (TECo) transmitted a Technical Specification Change Request to amend Appendix A of Facility Operating License NPF-3. In this change request, TECo proposed to modify Technical Specification (TS) Sections 3.0.3 and 4.0.3 and add Section 3.0.5 to bring them into agreement with the wording of Babcock and Wilcox Standard Technical Specifications (STS) NUREG-0103, Rev. 4. A previous safety evaluation addressed these TS changes. This safety evaluation addresses only the proposed addition of Paragraph 4.0.3.1 to Section 4.0.3. Section 4.0.3 provides guidance in the determination of equipment/system operability in the event of missed surveillance tests. Proposed Paragraph 4.0.3.1 would allow up to 12 hours from the time of discovery of a missed surveillance in which to perform the surveillance.

Evaluation

The proposed Section 4.0.3 which is identical to STS states:

Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exception to these requirements are stated in the individual Specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

The licensee proposes to add the following condition to the above Section if the missed surveillance was caused by administrative error and was a surveillance performed on a monthly or longer periodic interval:

If the failure to perform the Surveillance Requirement within the specified time limit is due to an administrative error, the applicable action shall be as follows:

With a piece of equipment or a system inoperable due to a missed Surveillance Requirement, perform the required surveillance within 12 hours from the time of discovery.

This applies only to those Surveillance Requirements performed on a monthly or longer periodic interval.

NOTE: If a Surveillance Requirement is missed due to an administrative error, appropriate reports must be filed even if the surveillance is performed within 12 hours.

The licensee proposed that the extension be of 12 hours duration since the maximum time required for a surveillance is 8 hours and an additional 4 hours are needed in case it is necessary to call in personnel to accomplish the required tests.

Since the beginning of Davis-Besse operations in 1977, there have been only two occasions when a surveillance schedule has been missed requiring an extension of time in which to perform the tests; therefore, this proposed waiver would be expected to be very rarely used.

On November 17, 1980, following the first refueling outage and during a regularly scheduled monthly functional test, the licensee failed to exercise the containment pressure transmitters for the Safety Features Actuation System (SFAS) trips. This came about because the exercising requirement was carried in a note at the bottom of Table 4.3-2 and was overlooked. On September 16, 1982, the monthly channel functional tests of four of the Steam and Feedwater Rupture Control System (SFRCS) steamline low pressure channels were overlooked and when discovered, time had passed the 25% time extension permitted by TS Section 4.0.2.

In both of these cases, upon discovery that the surveillance had been missed and the 25% time extension had passed, the instrument must be declared inoperable per TS Section 4.0.3, or the specific specification, and at that time the specified action must be taken. It is the staff's position that Action Statements are entered when the surveillance requirements should have been performed rather than at the time of discovery; therefore, in both of the above cases, the old TSs required the plant to be in hot standby in one hour.

In the above cases the licensee requested emergency TS amendments to delay starting the shutdowns until the required surveillances could be performed and the instruments declared operable. The licensee justified the requested emergency amendments because historically the instruments involved had shown no tendency to drift or be inoperable during previous surveillances such that there was no technical reason to suspect that the instruments would be inoperable and the transient introduced by starting an immediate shutdown from high power steady state conditions would increase the probability of challenges to the safety systems. The staff concurred with this reasoning and issued temporary amendments in each case; Amendment No. 35, dated January 5, 1981, and Amendment No. 46, dated October 13, 1982.

Recently the licensee has proposed revising TS Section 3.0.3, and when this is approved, the STS action provisions of 3.0.3 will, upon declaring an equipment or system inoperable, require the plant shutdown to start in one hour and be in hot standby in six hours. This change will alleviate the present rapid shutdown requirement and allow time in which to prepare for an orderly plant shutdown. The hour leeway will also provide an hour in which a missed surveillance may be completed.

There are about 90 TS surveillances that are required to be performed on monthly or greater periods. For many of these, the immediate shutdown provision of Section 3.0.3 is not required as the equipment/system is permitted to be inoperable for time periods of 72 hours to 30 days when specified actions are taken. Most of the other surveillances which if missed would require immediate shutdown are for the instrument/trip functions associated with the multiple channels in the Reactor Protection System, SFAS and SFRCS; however, for a missed surveillance on a single channel, the inoperable channel may be tripped to avoid the immediate shutdown requirement while completing the testing.

If the surveillance tests of less than a 30-day periodicity are excluded as well as those tests above which may have an inoperative channel tripped to avoid the immediate shutdown requirement, only six other specifications would be affected by this proposed 12-hour waiver as follows:

3.1.2.2, Boration System Flow Path - Operating, 31-day verification of valve lineups for flow path from the Borated Water Storage Tank via Makeup or DHR pump to the Reactor Coolant System. If this surveillance is missed, any required valving changes could be made in the one hour to start shutdown and the waiver would not be needed.

3.4.3, Safety and Electromatic Relief Valve - Operating, check lift settings every 18 months. If this surveillance is missed, a shutdown would be required and the 12-hour waiver could not be used. -

3.4.8, Reactor Coolant System Specific Activity, radio chemical for E determination every 6 months. If this surveillance is missed, the specific activity is trended by gross activity determinations on a 72-hour schedule and any significant activity increase would be known; also, the E sample and analysis could be determined in less than one hour so the waiver would be unnecessary.

3.7.1.4, Plant Systems, Secondary Coolant System Activity, Specific Activity >0.10 $\mu\text{Ci}/\text{gram}$ Dose Equivalent I-131. For the same reasons above, the waiver would also be unnecessary for this specification.

3.6.1.1, Containment Integrity, Verification of Penetration Valving. If this 31-day surveillance is missed, it could be performed within one hour.

3.6.3.1, Containment Isolation Valves Operability. If this surveillance is missed, there are three actions that can be taken within four hours to correct the inoperability and many of the 161 valves are in redundant systems where the affected system could be taken out of service to complete the test during operations. If the tests could not be made during operations, a shutdown would be required and the waiver could not be used.

3.7.1.5, Main Steam Line Isolation Valves (MSIV) Operability. A relief request from Section XI of the ASMC Code to omit the quarterly testing of the MSIVs has been granted. If the 18-month testing was missed, the plant would be required to shutdown to complete the testing and the waiver would not be needed.

The licensee's proposal to extend the grace period for administratively missed surveillance testing requirements is not without merit. There are times when maintaining the plant in steady state condition during testing would be preferable to taking the plant through a transient, provided there is reasonable assurance to believe that the equipment to be tested is still operable. However, the staff finds this proposed license amendment unacceptable. The above review indicates that the change would have limited applicability, and the lack of a precise definition of "administrative error" can result in misinterpretation if the change were incorporated into the general surveillance requirements of paragraph 4.0.3 of the Technical Specifications. The staff also believes that by judicious scheduling of surveillance requirements, there would be very limited need for this change.

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