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John P. Stetz Vice President - Nuclear Davis-Besse

Docket Number 50-346

License Number NPF-3

Serial Number 2369

March 29, 1996

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

Subject: License Amendment Application to Revise Technical Specifications 3/4.6.4.4 - Hydrogen Purge System, 3/4.6.5.1 - Shield Building Emergency Ventilation System, and 3/4.7.6.1 - Control Room Emergency Ventilation System

Ladies and Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit 1 Operating License Number NPF-3, Appendix A, Technical Specifications (TS). The proposed changes involve the subject TS regarding the Surveillance Requirements for charcoal filter laboratory testing to revise the testing methodology used to determine operability of the charcoal filters in the engineered safeguards features (ESF) air handling units. Currently, the DBNPS is required to test charcoal in the ESF air handling units per Regulatory Guide 1.52, Revision 2, "Design, Testing, and Maintenance Criteria For Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," dated March 1978. However, the DBNPS has been utilizing an alternative method of testing which, although it provides accurate assurance that these air handling units will perform their design function, it does not literally comply with a strict reading of the TS. The proposed changes incorporate the current testing methodology.

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The proposed changes are being submitted as an emergency license amendment application. Absent NRC approval of this emergency license amendment application, a plant shutdown is required due to the inability to perform the tests literally required by the TS in the time available. The Action statements of TS 3.6.4.4 and TS 3.9.12 (Refueling Operations - Storage Pool Ventilation) have been entered. Technical Specification 4.0.3 allows 24 hours for delaying the actions of TS 3.0.3 for TS 3.6.5.1 and TS 3.7.6.1. These 24-hours will expire at 1342 hours on March 29, 1996, requiring completion of the actions of TS 3.0.3. Accordingly, Toledo Edison requests that the enclosed license amendment application be approved and issued by the NRC as an emergency license amendment in the manner allowed by 10CFR50.91(a), by 1342 hours on March 29, 1996.

Toledo Edison has performed the attached environmental assessment and determined that the proposed amendment, if approved, will have no significant impact on the environment or irreversible environmental consequences.

Toledo Edison will evaluate ASTM D 3803-1989 "Standard Test Methods for Radioiodine Testing of Nuclear-Grade Gas-Phase Adsorbents," for incorporation into the DBNPS Technical Specifications.

Should you have any questions or require additional information, please contact Mr. James L Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,

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Enclosure

CC: W. L. Axelson, Director, NRC Region III, Division of Reactor Projects L. L. Gundrum, DB-1 NRC/NRR Project Manager Dr. Gail H. Marcus, NRC Project Director H. J. Miller, Regional Administrator, NRC Region III S. Stasek, DB-1 NRC Senior Resident Inspector J. R. Williams, Chief of Staff, Ohio Emergency Management Agency, State of Ohio (NRC Liaison) Utility Radiological Safety Board