



**CENTERIOR
ENERGY**

DOCKET NUMBER PR 50
PROPOSED RULE (57 FR 14514)

DOCKETED
USNRC

22

Donald C. Shelton
Vice President Nuclear
Davis-Besse

'92 JUL 13 P4:10

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

Docket Number 50-346

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

License Number NPF-3

Serial Number 2064

July 6, 1992

Mr. Samuel J. Chilk
Secretary of the Commission
Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Comments on Proposed Revision to 10 CFR 50.63, "Loss of All Alternating Current Power", 57 Federal Register 14514, April 21, 1992

Dear Mr. Chilk:

Toledo Edison (TE), a subsidiary of Centerior Energy, is partial owner of and is responsible for operation of the Davis-Besse Nuclear Power Station. Toledo Edison has been authorized for power operation of the Davis-Besse Nuclear Power Station since April 1977. As a 10 CFR 50 licensee, Toledo Edison has a vested interest in any policies the U.S. NRC may adopt which can affect the management and operation of a commercial nuclear power plant.

Toledo Edison has reviewed the comments drafted on behalf of the nuclear power industry by the Nuclear Management and Resources Council (NUMARC) and the Nuclear Utility Backfitting and Reform Group (NUBARG) and endorses their comments. In addition, Toledo Edison provides the following comments:

1. The proposed rule effectively endorses Regulatory Guide 1.9 (Revision 3) as the only means of ensuring compliance with the rule for design, testing and monitoring performance of diesel generators. The Emergency Diesel Generators (EDGs) at the Davis-Besse Nuclear Power Station are designed and tested in accordance with an earlier revision of Regulatory Guide 1.9 and EDG performance is monitored in accordance with TE's commitment to NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout of Light Water Reactors". Over the past several years, TE has maintained high reliability of the EDGs. Therefore, the imposition of any additional requirements beyond TE's current commitments would not be cost or risk beneficial to TE.

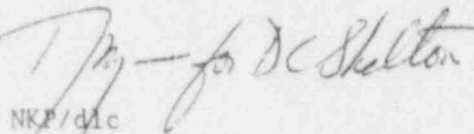
0510

Docket Number 50-346
License Number NPF-3
Serial Number
Page 2

2. Modification to the enforcement policy in 10 CFR Part 2, Appendix C, which would consider exceeding a "double trigger" an example of a Severity Level III violation, is inappropriate. The NRC states that the purpose of considering this change is to "emphasize the importance of having reliable diesel generators". By virtue of the industry's improvement in diesel generator reliability over the past several years, it is evident that the industry also considers this important and the perceived "threat" of a Severity Level III violation is unnecessary.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing at (419) 249-2366.

Sincerely yours,


NKP/dlc

cc: A. B. Davis, Regional Administrator, NRC Region III
J. B. Hopkins, NRC/NRR Senior Project Manager
W. Levis, DB-1 NRC Senior Resident Inspector
USNRC Document Control Desk
Utility Radiological Safety Board