Docket Number 50-346
License Number NPF-3
Serial Number 2037
Enclosure
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APPLICATION FOR AMENDMENT

TO

FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION

UN\_T NUMBER 1

Attanhed are requested changes to the Davis-Resse Nuclear Power Station, Unit Number 1, Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes submitted under cover letter Serial Number 2037 concern:

Appendix A, Technical Specification (TS) Figure 5.1-1, DBNPS Exclusion Area, TS Figure 5.1-2, DBNPS Low Population Zone, TS Figure 5.1-3, DBNPS Unrestricted Area Boundary for Liquid Effluents, TS Figure 5.1-4, DBNPS Unrestricted Area Boundary for Gaseous Effluents, TS 5.1.1, Site Exclusion Area, TS 5.1.2, Low Population Zone, and TS 5.1.3, Site Boundary.

By:

D. C. Shelton, Vice President,

Nuclear - Davis-Besse

Sworn and Subscribed before me this 11th day of September, 1992.

Notary Public, State of Ohio

EVELYN 1. DRESS NOTARY PUBLIC. STATE OF OHIO My Commission Expires July 28, 1994 Docket Number 50-346 License Number NPF-3 Serial Number 2037 Enclosure Page 2

The following information is provided to support issuance of the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1, Operating License Number NPF-3, Appendix A Technical Specifications:

- A. Time Required to Implement: This change is to be implemented within 90 days after the NRC issuance of the License /mendment.
- B. Reason for change (Licanse Amendment Request Number 91-0004): This license amendment request proposes deletion of TS Figure 5.1-1, DBNPS Exclusion Area, TS Figure 5.1-2, DBNPS Low Population Zone, TS Figure 5.1-3, DBNPS Unrestricted Area Boundary for Liquid Effluents, and TS Figure 5.1-4, DBNPS Unrestricted Area Boundary for Gaseous Effluents, on the basis that information provided by these figures is already located in the DBNPS Updated Safety Analysis Report. Additionally, TS 5.1.1, Site Exclusion Area, TS 5.1.2, Low Population Zone, and TS 5.1.3, Site Boundary, are proposed for revision to reflect the above deletions.
- C. Safety Assessment and Significant Hazards Consideration: See attached.

> Safety Assessment and Significant Hazards Consideration for License Amendment Request Number 91-0004

#### TITLE:

Proposed Deletion of Technical Specification (TS) Figure 5.1-1, Davis-Besse Nuclear Power Station (DBNPS) Exclusion Area, TS Figure 5.1-2, DBNPS Low Population Zone, TS Figure 5.1-3, DBNPS Unrestricted Area Boundary for Liquid Effluents, and IS Figure 5.1-4, DBNPS Unrestricted Area Boundary for Gaseous Effluents and Proposed Revision of TS 3.1.1, Site Exclusion Area, TS 5.1.2, Low Population Zone, and TS 5.1.3, Site Boundary

### DESCRIPTION:

This License Amendment Request (LAR) proposes deletion of TS Figure 5.1-1, TS Figure 5.1-2, TS Figure 5.1-3, and TS Figure 5.1-4, on the basis that these figures are already maintained in the DBNPS Updated Safety Analysis Report (USAR) as USAR Figure 2.1-3, DBNPS 3.te arrangement, and USAR Figure 2.1-7, DBNPS Low Population Zone. The criteria for establishing the site boundary, unrestricted area, exclusion area and low population zone continue to be defined by the TS and by regulations (10 CFR Part 100, Reactor Site Criteria). Consequently, the proposed changes do not relax any existing requirements, but facilitate administrative changes involving these figures, including the use in the USAR of figures with greater clarity and detail. Specifically, the following changes are proposed:

1. TS 5.1.1, Site Exclusion Area, currently refers to TS Figure 5.1-1. TS 5.1.1 would be revised to delete the reference to TS Figure 5.1-1 and the following sentence would be inserted:

"The Site Exclusion Are? is as defined in 10 CFR Part 100."

TS Figure 5.1-1 shows the site boundary and the site exclusion area. USAR Section 2.1.2, Site Description, states, in part:

"The site, site arrangement, and location of the major statica structures are shown on Figure 2.1-3. The site boundary shown on this figure is also the limit of the exclusion area."

This establishes that USAR Figure 2.1-3 reflects the same information relative to the ' ' 'oundary and exclusion area as TS Figure 5.1-1.

2. TS 5.1.2, Low Population Zone, currently refers to TS Figure 5.1-2. TS 5.1.2 would be revised to delete the reference to TS Figure 5.1-2 and the following sentence would be inserted:

"The Low Population Zone is as defined in 10 CPR Part 100."

TS Figure 5.1-2 shows the DBNPS Low Population Zone. USAR Section 2.1.3.3, Low Population Zone, states, in part:

"The low population zone has been established as that area outside of the site boundary within a radius of two miles from the center of the containment structure."

USAR P'qure 2.1-7 shows the site boundary and a two mile radius circl. Irom a point equivalent to the center of the containment structure. TS Figure 5.1-2 shows the site boundary and a circle of two mile radius from a point equivalent to the center of the containment structure. Therefore, USAR Figure 2.1-7 reflects the same information relative to the site boundary and low population zone as TS Figure 5.1-2.

3. TS 5.1.3, Site Boundary, currently refers to TS Figure 5.1-3 and TS Figure 5.1-4. TS 5.1.3 would be revised to delete the reference to TS Figure 5.1-3 and TS Figure 5.1-4 and the following sentence would be inserted:

"The UNRESTRICTED AREA and SITE BOUNDARY are defined in Technical Specification Section 1.0, Definitions."

TS Figure 5.1-3 shows the site boundary as the unrestricted area boundary for liquid effluents. USAR Section 11.2.1, Liquid Waste Systems - Design Objectives, states, in part:

"The systems handling liquid wastes are designed such that the estimated releases in liquid effluents comply with the following requirements of 10 CFR 20 and 10 CFR 50:

a. The individual radionuclide concentrations in the liquid effluents at the site houndary shall not exceed the limits for releases to unrestricted areas given in Appendix B of 10 CFR 20."

This establishes that USAR Figure 2.1-3 reflects the same information relative to the site boundary and the unrestricted area boundary for liquid effluents as TS Figure 5.1-3.

IS Figure 5.1-4 shows the site boundary as the unrestricted area boundary for gaseous effluents. USAR Section 2.1.2.2, Boundaries for Establishing Effluent Release Limits, states, in part:

"The site boundary as shown on USAR Figure 2.1-3 is the boundary line which determines the limits of gaseous releases for purposes of TS limits to fulfill the requirements of 10 CFR 20 pertaining to radioactive releases to unrestricted areas."

As with TS Figure 5.1-3, this establishes that USAR Figure 2.1-3 reflects the same information relative to the site boundary and the unrestricted area boundary for gaseous effluents as TS Figure 5.1-4.

As described above, this LAR is an administrative change requesting deletion of TS information that is defined by TS or Nuclear Regulatory Commission regulation and is also maintained in the USAR. Presently, any changes to the facility affecting the USAR figures would require a corresponding license amendment request per 10 CFR 50.90. Under this proposed LAR, changes to these facility as reflected in these figures would be controlled by 10 CFR 50.59, which would require submittal of a license amendment request only if the proposed facility change involves an unreviewed safety question.

## SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

This LAR affects the TS sections and figures showing the maps of the Unrestricted Area, the Exclusion Area, and the Low Population Zone. No systems or components are affected by the proposed revision of these TS sections or deletion of these TS figures.

# SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVI 'ES:

The function of TS Section 5 is to contain the facility design features including those features of the facility such as materials of construction and geometric arrangements which, if altered or modified, would have a significant effect on safety, and which are not covered in the TS Limiting Conditions for Operation, Surveillance Requirements, or Safety Limits and Limiting Safety System Settings. The purpose of the TS is to maintain the validity of the Updated Safety Analysis Report.

## EFFFCTS ON SAFETY:

This LAR is strictly an administrative change, deleting TS figures, the content of which continue to be defined by TS and 10 CFR Part 100, and that are already maintained in the USAR. Changes to these USAR figures would still be controlled by the 10 CFR 50.59 process. Thus, this proposed revision of the TS sections and deletion of the TS figures has no adverse effect on safety.

## SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in a cordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed changes and determined that a

significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station, Unit Number 1, in accordace with the proposed changes would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because this is strictly an administrative change to delete from the Davis-Besse Nuclear Power Station (DBNPS) Technical Specifications (TS) information that is already maintained in the DBNPS Updated Safety Analysis Report (USAR). There are no accident initiators or assumptions affected by the proposed changes.
- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because this is strictly an administrative change to delete from the DBNPS TS information that is all addy maintained in the DBNPS USAR. There is no effect on the source term or containment isolation, and no increase in radiological effluents.
- 2a. Not create the possibility of a new kind of accident from any accident previously evaluated because this is strictly an administrative change to delete from the DBNPS TS information that is already maintained in the DBMPS USAR.
- 2b. Not create the possibility of a different kind of accident from any accident previously evaluated because this is strictly an administrative change to delete from the DBNPS TS information that is already maintained in the DBNPS USAR.
- Not involve a significant reduction in a margin of safety because this is strictly an administrative change to delete from the DBNPS TS information that is already maintained in the DBNPS USAR.

#### CONCLUSION:

On the basis of the above, Toledo Edison has determined that the License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns proposed changes to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

### ATTACHMENT:

Attached are the proposed marked-up changes to the Operating License.