



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

April 6, 1984

MEMORANDUM FOR: Gus C. Lainas, Assistant Director for Operating Reactors, DL  
THRU: John F. Stolz, Chief, Operating Reactors Branch #4, DL  
FROM: Albert De Agazio, Project Manager, Operating Reactors  
Branch #4, DL  
SUBJECT: BACKFIT ISSUE AT DAVIS-BESSE

Backfit Issue: Technical Specification changes are required to assure availability of AFW system. Modifications would 1) require monthly verification that all valves in suction and discharge path of the AFW system are locked-open, 2) require an AFW availability test of the AFWS after each cold shutdown of 30 days or longer, and 3) require an individual be stationed at the manual valves in the AFWS and to be in communication with the control room when conducting periodic AFWS tests which require local manual valve repositioning.

Licensees Position: With respect to items 1 and 3, the licensee asserts that station procedures already require these actions and Technical Specification to cover these actions are unnecessary.

With regard to item 2, the licensee is reluctant to add AFW to the system unnecessarily because of oxygen control considerations in the steam generators. A compromise position was reached in early 1983 on this issue but later ASB reconsidered its position and rejected the compromise position.

Milestones

8/3/82 DL issues ASB's SER to TED requesting review and comment.  
9/29/82 Telephone conference with NRC and TED to discuss issues.  
11/19/82 Only TED position not indicated as acceptable related to AFW availability test.  
10/19/82 Telephone conference with NRC and TED. Discussed possibility of using Oconee approach to AFW availability test. TED appeared receptive.  
1/12/83 Mutual acceptable position cannot be reached. TED reminded of availability of appeal process.  
1/10/83 Appeal meeting scheduled 2/3/83.  
1/12/83 Area of misunderstanding about test identified TED proposed Tech Specs which appeared to be acceptable to ASB. Appeal meeting cancelled.  
1/20/83  
6/15/83 TED submitted application for Tech Spec per discussions of 1/20/83.  
8/29/83 ASB issues SER with three open issues and rejecting application of 6/15/83.  
2/21/84 DL issues SER to TED.  
3/20/84 TED informs ORPM of intention to request appeal on all open issues.

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PDR FOIA  
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Applicability to other facilities: Applicable to all PWRs.

*Albert De Agazio*  
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