CENTERIOR ENERGY

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United States Nuclear Regulatory Commission
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Subject: License Amendment Application to Revise Technical Specifications Regarding Boron Dilution Requirements

Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications to reflect the changes attached. The proposed changes involve Technical Specification (TS) 3.1.1.2, Reactivity Control Systems-Boron Dilution, and associated TS Bases 3/4.1.1.2.

Technical Specification 3.1.1.2 requires that the flow rate of reactor coolant through the Reactor Coolant System (RCS) be greater than or equal to 2800 gpm whenever a reduction in RCS boron concentration is being made. A minimum flow rate of at least 2800 gpm provides adequate mixing, prevents stratification and ensures that reactivity changes will be gradual in the RCS. This TS is applicable in all plant Modes. With the flow rate of reactor coolant through the RCS less than 2800 gpm, the TS Action statement requires the immediate suspension of all operations involving a reduction in RCS boron concentration.

The proposed change to TS 3.1.1.2 would add a footnote that provides an exception applicable in Mode 6 (refueling). Specifically, with the flow rate of reactor coolant through the RCS less than 2800 gpm, the footnote would allow the addition of water of lower boron concentration than the RCS, provided that the boron concentration of the water to be added is greater than the boron concentration corresponding to the more restrictive reactivity condition specified in TS 3.9.1, Refueling Operations-Boron Concentration. This exception is acceptable since as long as the boron concentration of the water to be added to the RCS is

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greater than the refueling boron concentration, the RCS boron concentration is assured to remain greater than the required refueling concentration. Therefore, in this situation, even if incomplete mixing did occur, it would be of no adverse safety consequence. A related change is proposed clarifying Bases 3/4.1.1.2.

Toledo Edison requests that this amendment be issued by the NRC by October 30, 1992, to support the planning and scheduling of the Eighth Refueling Outage (8RFO). The 8RFO is currently scheduled to commence on March 1, 1993. Should further information be required, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

DJ Shelton -- for DC Shelton

MKL/dlp

Enclosure

cc: A. B. Davis, Regional Administrator, NRC Region III
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