Docket Number 50-346 License Number NPF-3 Serial Number 2101 Enclosure Page 1

## APPLICATION FOR AMENDMENT

TO

# FACILITY OPERATING LICENSE NUMBER NPF-3

# DAVIS-BESSE NUCLEAR POWER STATION

## UNIT NUMBER 1

Attached are requested changes to the Davis-Besse 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 2101 concern:

Appendix A, Technical Specification 3/4.3.3.5, Instrumentation -Remote Shutdown Instrumentation and its Bases

Appendix A, Technical Specification 6.9.2, Special Reports

By: D. C. Shelton, Vice President, Nuclear - Davis-Besse

Sworn and Subscribed before me this 23rd day of December.

Public, State of Ohio

BETTY L. WOOD, Notary Public State of Ohio My Commission Expires July 1, 1996



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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 Specification (TS) 3/4.3.3.5, Instrumentation - Remote Shutdown Instrumentation and its Bases, and TS 6.9.2, Special Reports.

- A. Time Required to Implement: This change is to be implemented no later than startup (Mode 2) from the first refueling outage following NRC amendment approval. This will allow the first performance of the amendment-associated testing during shutdown conditions, rather than during power operations.
- B. Reason for change (License Amendment Request 92-0010): Revise TS 3/4.3.3.5, Instrumentation - Remote Shutdown Instrumentation and its Bases to add testing requirements for transfer switches used to meet 10 CFR Part 50, Appendix R requirements in accordance with Toledo Edison's (TE) commitment to the NRC documented in TE letter Serial Number 2070, dated July 28, 1992. Transfer switches are used to allow a component to be controlled only from a local location when a serious control room or cable spreading room fire renders the control room uninhabitable and control of the components is required in order to achieve and maintain safe shutdown of the plant. In addition, revise Ts 6.9.2 to reference a new special report requirement.
- C. Safety Assessment and Significant Hazards Consideration: See attached.

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION

# TITLE:

Revise Technical Specification (TS) 3/4.3.3.5, Instrumentation - Remote Shutdown Instrumentation and its Bases to Add a Limiting Condition for Operation and Surveillance Testing Requirements for 10 CFR Part 50, Appendix R Accredited Transfer Switches. Revise Specification 6.9.2 to Reference a New Special Report Requirement.

#### DESCRIPTIONS:

This License Amendment Request (LAR) proposes revision of TS 3/4.3.3.5, Instrumentation - Remote Shutdown Instrumentation and its Bases to add a Limiting Condition for Operation (LCO) and surveillance testing requirements for transfer switches which are used to shift control of components from the control room to either the remote shutdown banel or to another local location in the event of a serious fire in either the control room (Fire Area FF) or cable spreading room (Room 422A, Fire Area DD). In Toledo Edison (TE) letter Serial Number 2070, dated July 28, 1992, TE committed to submit an LAR that would add Appendix R accredited transfer switch testing requirements. This commitment resolved a Nuclear Regulatory Commission (NRC) Staff comment made during the review of TE's LAR 90-0013, which proposed removal of the Fire Protection TSs (submitted by TE letter Serial 1789, November 1, 1991). License Amendment Request 90-0013 was approved by the NRC through issuance of License Amendment 174, by letter dated September 22, 1992. The testing requirements for Remote Shutdown Systems from the Babcock and Wilcox Revised Standard Technical Specifications (B&W RSTS) (NUREG-1430, Rev. 0 dated September 28, 1992), were used to meet the guidelines of Item 8 (j) (demonstrate testing of transfer switches) of Enclosure 1 to NRC Generic Letter 81-12, Fire Protection Rule (dated February 20, 1981).

Specifically, it is proposed that the existing LCO 3.3.3.5 be renumbered to LCO 3.3.3.5.1, and a new LCO 3.3.3.5.2 be added which would state:

"The control circuits and transfer switches required for a serious control room or cable spreading room fire shall be OPERABLE."

Additionally, it is proposed that the existing Action "b" be re-designated as Action "c", and a new Action "b" added which would state:

"With one or more control circuits or transfer switches required for a serious control room or cable spreading room fire inoperable, restore the inoperable circuit(s) or switch(es) to OPERABLE status within 30 days, or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the circuit(s) or switch(es) to OPERABLE status."

In addition, it is proposed that the existing Surveillance Requirement (SR) 4.3.3.5 be renumbered to SR 4.3.3.5.1 and a new SR 4.3.3.5.2 be added which would state:

"At least once per 18 months, verify each control circuit and transfer switch required for a serious control room or cable spreading room fire is capable of performing the intended function."

Additionally, the following would be added to TS Bases 3/4.3.3.5, Remote Shutdown Instrumentation:

"SR 4.3.3.5.2 verifies that each Remote Shutdown System transfer switch and control circuit required for a serious control room or cable spreading room fire performs its intended function. This verification is performed from the remote shutdown panel and locally, as appropriate. This will ensure that if the control room becomes inaccessible, the unit can be safely shutdown from the remote shutdown panel and the local control stations."

Finally, a change to Specification 6.9.2 is proposed to add a new paragraph "g" which would state:

"Inoperable Remote Shutdown System control circuit(s) or transfer switch(es) required for a serious control room or cable spreading room fire, Specification 3.3.3.5.2."

The list of specific transfer switches to be tested has been developed based on a review of the Fire Hazard Analysis Report (FHAR) for the control room and cable spreading room fire areas. This list will be maintained in the appropriate plant surveillance testing procedures. The surveillance testing procedure will require operation of the safe shutdown component from the local location as part of the testing.

#### SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

The transfer switches for the following components would be tested under the new Surveillance Requirement 4.3.3.5.2:

Auxiliary Feedwater Pump Turbine System Admission Valve ICS038B Component Cooling Water Pump P43-1 Containment Air Cooler C1-1 Decay Heat Removal System Pump P42-1 Decay Heat Removal System Valve DH1517 (Decay Heat Removal Pump 1-1 Suction Valve) Decay Heat Removal System Valve DH64 (Low Pressure Injection/High Pressure Injection Cross Tie Valve) Emergency Diesel Generator 1 Emergency Diesel Generator DA1147A/B (Air Start Solenoid Valves) Essential Power Busses C1 and E1 Make-up and Purification Pump P37-1 (and its Lubrication Oil Pumps) Make-up and Purification Valve MUO2B (Letdown Cooler Inlet Valve) Reactor Coolant System Valve RC11 (PORV Block Valve) Service Water System Pumps P3-1 and P3-3 Service Water System Valve SW1382 (Auxiliary Feedwater Pump 1 Suction)

## SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The transfer switches are used to transfer control of safe shutdown components from the control room to a local location when a serious control room or cable spreading room fire renders the control room uninhabitable and control of the components is required in order to achieve and maintain safe shutdown of the plant.

The purpose of testing the transfer switches is to verify on a periodic basis that the switches are capable of performing their intended functions. This testing will demonstrate that equipment operates from the local control station when the transfer or isolation switch is placed in the "local" position and that the equipment cannot be operated from the control room. This testing will also demonstrate that equipment operates from the control room wher the transfer or isolation switch is returned to the normal position.

## EFFECTS ON SAFETY:

The addition of the LCO and surveillance testing react ements to verify the ability of the transfer switches to transfer con 1 of safe shutdown components from the control room to a local location will periodically verify that these switches can perform their required function. The test procedures will stipulate the plant mode or condition under which the testing can be performed, normally during plant outages, in order to minimize the likelihood of adversely affecting plant status. Test procedures are required to be prepared, reviewed and approved in accordance with the requirements of TS 6.5.3, Technical Review and Control. Technical Specifications 6.5.3 requires review by a separate individual meeting or exceeding the requirements of Sections 4.2, 4.3.1, 4.4 or 4.6 of ANSI 18.1, 1971, Selection and Training of Nuclear Power Plant Personnel. Each review performed under TS 6.5.3 will also include a determination of whether an unreviewed safety question is involved as defined in 10 CFR 50.59.

It is, therefore, concluded that these changes have no adverse effect on safety.

The proposed change to Specification 6.9.2 is an administrative change and 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 accordance 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 accordance with the proposed changes would:

- Not involve a significant increase in the probability of an 1a. accident previously evaluated because none of the proposed changes are associated with the initiation of any design bases accident. The addition of Limiting Condition for Operation (LCO) 3.3.3.5.2 and Surveillance Requirement (SR) 4.3.3.5.2 to the Technical Specifications will require each control circuit and transfer switch that is required for a serious control room or cable spreading room fire to be operable during Modes 1, 2 and 3 and to be verified at least once per 18 months as capable of performing the intended function. New Action b will require restoration of an inoperable control circuit or transfer switch (required for a serious control room or cable spreading room fire) within 30 days or a Special Report submitted to the NRC pursuan, to Specification 6.9.2 within the next 30 days. Surveillance testing procedures will be prepared, reviewed and approved in accordance with Technical Specification (TS) 6.5.3, Technical Review and Control, which will ensure an unreviewed safety question is not created. To support the addition of the new LCO, Action and SR, the existing LCO, Action and SR are proposed to be adminstratively re-numbered or re-lettered. The new Special Report requirement is proposed to be administratively added to TS 6.9.2.
- Not involve a significant increase in the consequences of an 1b. accident previously evaluated because no equipment, accident conditions, or assumptions are affected which could lead to significant increases in radiological consequences. The addition of LCO 3.3.3.5.2 and SR 4.3.3.5.2 to the Technical Specifications will require each control circuit and transfer switch that is required for a serious control room or cable spreading room fire to be operable during Modes 1, 2 and 3 and to be verified at least once per 18 months as capable of performing the intended function. New Action b will require restoration of an inoperable control circuit or transfer switch (required for a serious control room or cable spreading room fire) within 30 days or a Special Report submitted to the NRC pursuant to Specification 6.9.2 within the next 30 days. Surveillance testing procedures will be prepared. reviewed and approved in accordance with Technical Specification (TS) 6.5.3, which will ensure an unreviewed safety question is not created. To support the addition of a new LCO, Action and SR, the existing LCO, Action and SR are proposed to be administratively re-numbered or re-lettered. The new Special Report requirement is proposed to be administratively added to TS 6.9.2.
- 2a. Not create the possibility of a new kind of accident from any accident previously evaluated because no new accident initiators are introduced by the proposed changes. The addition of LCO 3.3.3.5.2 and SR 4.3.3.5.2 to the Technical Specifications will require each control circuit and transfer switch that is required for a serious control room or cable spreading room fire to be

> operable during Modes 1, 2 and 3 and to be verified at least once per 18 months as capable of performing the intended function. New Action b will require restoration of an inoperable control circuit or transfer switch (required for a serious control room or cable spreading room fire) within 30 days or a Special Report cubmitted to the NRC pursuant to Specification 6.9.2 within the Lext 30 days. Surveillance testing procedures will be prepared, reviewed and approved in accordance with TS 6.5.3, which will ensure an unreviewed safety question is not created. To support the addition of the new LCO, Action and SR, the existing LCO, Action and SR are proposed to be administratively re-numbered or re-lettered. The new Special Report requirement is proposed to be administratively added to TS 6.9.2.

- Not create the possibility of a different kind of accident from 26. any accident previously evaluated because no different accident initiators are introduced by the proposed changes. The addition of LCO 3.3.3.5.2 and SR 4.3.3.5.2 to the Technical Specifications will require each control circuit and transfer switch that is required for a serious control room or cable spreading room fire to be operable during Modes 1, 2 and 3 and to be verified at least once per 18 months as capable of performing the intended function. New Action b will require restoration of an inoperable control circuit or transfer switch (required for a serious control room or cable spreading room fire) within 30 days or a Special Report submitted to the NRC pursuant to Specification 6.9.2 within the next 30 days. Surveillance testing procedures will be prepared, reviewed and approved in accordance with TS 6.5.3, which will ensure an unreviewed safety question is not created. To support the addition of the new LCO, Action and SR, the existing LCO, Action and SK are proposed to be administratively re-numbered or re-lettered. The new Special Report requirement is proposed to be administratively added to TS 6.9.2.
- 3. Not involve a significant reduction in a margin of safety because these are not new or significant changes to the initial conditions contributing to accident severity or consequences, therefore, there are no significant reductions in a margin of safety.

# 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.