

OCT 1 5 1984

MEMORANDUM FOR: W. G. Rogers, Senior Resident Inspector, Davis-Besse  
FROM: C. E. Norelius, Director, Division of Reactor Projects  
SUBJECT: DAVIS-BESSE - DIFFERING PROFESSIONAL OPINION

The purpose of this memorandum is to respond to your memorandum dated July 24, 1984, regarding the powering of a vital bus from a non-Class 1E power source. This matter was discussed between N. Jackiw and G. Holahan of NRR. This same concern was previously identified in a memorandum from C. Michaelson (AEOD) to H. Denton (NRR) dated July 15, 1980. This memorandum stated that without technical specification restrictions governing the Class 1E 120 VAC vital instrument buses and associated invertors, these power sources could be out of service indefinitely and thereby may place certain safety systems in a situation where they could not meet the single failure criterion. NRR concurred with the AEOD recommendation that LCO's should be applied to these operating reactors not presently having LCO's specifically addressing the loss of Class 1E 120 V AC vital instrument buses.

The Division of Licensing (DL) has led the NRR effort to resolve this issue since it was identified by AEOD. A technical evaluation by Lawrence Livermore National Laboratory, accepted by the NRC, dated October 28, 1982, supports a 72 hour/year outage limit as a Limiting Condition for Operation. The lead responsibility for this issue (Generic Issue 48) has now been transferred from DL to DSI (Division of Systems Integration) by memorandum from T. Speis to R. Mattson dated March 1, 1984). DSI's work of establishing an appropriate technical specification change is nearing completion, subject to NRR and CRGR review.

Attachment 1 is a schedule of completion for this generic issue and it will be monitored by the Generic Issue Management Control System (GIMCS). The 120 V AC vital instrument bus issue was ranked by priority in accordance with the requirements of NUREG-0933 and Generic Letter 84-19 (Attachment 2). All other documentation relating to the proposed resolution of this issue will be sent to you upon your request.

There is no disagreement with the issue that you have raised. The question is related to the timing of implementing the change in the Technical Specifications. I support the NRR schedule for providing a generic resolution to this issue. However, in the interim, N. Jackiw has contacted the Davis Besse plant management and they have agreed to comply with our position on the operability of the buses until this matter is resolved. We were also informed that the licensee has submitted a Technical Specification change request on this subject.

G. W. Rogers

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Your concern in this matter is appreciated. If you have any additional questions, please feel free to contact me or your section chief.

C. E. Norelius, Director  
Division of Reactor Projects

Attachments: As stated

cc: J. G. Keppler  
A. B. Davis  
D. Eisenhut, NRR  
G. Holohan, NRR  
R. L. Spessard

R111  
B. B. J.  
Jackiw/bj  
10/11/84

R111  
Shaffer

R111  
Norelius  
10/11/84

Attachment 1

GENERIC ISSUE MANAGEMENT CONTROL SYSTEM

<u>Issue Number</u>	<u>Issue Type</u>	<u>Action Level</u>	<u>Office/Div/Br</u>	<u>Task Manager</u>	<u>Tac No</u>
48	Safety/ Note 2	Active-L1	NRR/DSI/PSB	O. Chopra	<del>TBP</del> 55223

Title ----- LCO for Class 1E 120V AC Vital Instrument Buses in Operating Reactors.

Work Authorization --- Memorandum to D. G. Eisenhower from H. R. Denton dated October 15, 1983. -----

Memorandum to R. J. Mattson from T. S. Speis dated March 1, 1984, "Transfer of Lead Responsibility for Generic Issue No. 48 from DL to DSI."

NRR FY-84 Operating Plan, (Appendix G).

Contract Title ----- PWR 120V AC Vital Instrument Buses and Inverter Technical Specifications

Contractor Name/  
FIN No. ----- Lawrence Livermore Laboratory/UCID 19469

Work Scope ----- Review LLNL Technical Evaluation Report containing the technical finding to the above issue. Determine if there is any need for additional work to be performed by the staff or staff contractor. Prepare package containing the resolution of the issue for CRGR review. After CRGR approval issue generic letter requesting all licensees to propose technical specifications limiting the ~~item~~ the 120V AC vital buses may be energized from a source other than its Class 1E DC bus and associated inverter. time

Affected Documents --- Plant Technical Specifications

Status ----- ~~Inactive FY 1984. Work under this TAP will not begin until FY 1985. RRA8 will complete its review of the PRA prepared by LLNL by 02/85.~~

Problem/Resolution --- None

Technical Resolution -

<u>Milestones</u>	<u>Original</u>	<u>Current</u>	<u>Actual</u>
Generic Issue 48 assigned to DL by Director, NRR	-	-	10/15/83
Generic issue lead responsibility transfer from DL to DSI	-	-	03/01/84

As of Third Quarter FY-84

## Generic Issue #48

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<u>Milestones</u>	<u>Original</u>	<u>Current</u>	<u>Actual</u> 05/01/84
Request to RRAB for technical assistance to review PRA done by LLNL	10/84	-	-
Complete review of LLL report by the RRAB	02/85	-	-
Technical resolution identified. Prepare review package for CRGR	04/85	-	-
Division Director approval of CRGR package. Package to other division directors for comments.	06/85	-	-
Other division comments incorporated. Package sent to Director, NRR.	07/85	-	-
Director, NRR review complete. Package sent to CRGR.	08/85	-	-
CRGR review complete.	09/85	-	-
EDO approval.	10/85	-	-
OMB clearance.	01/86	-	-
Issue generic letter to all operating plants	02/86	-	-
Technical resolution complete	02/86	-	-

TASK MANAGER VERIFICATION: 10.4 Closure DATE: 9/12/84

As of Third Quarter FY-84

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This letter does not contain any new requirements or guidance for licensees of operating reactors, applicants for operating licenses, and holders of construction permits. No reply is required.

*Frank J. Miraglia*

*FM* Darrell G. (Eisenhut), Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

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