March 24, 1988

Docket No. 50-346
Serial No. DB-88-014

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Mr. Donald C. Shelton
Vice President - Nuclear
Toledo Edison Company
Edison Plaza - Stop 712
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Toledo, Ohio 43652

Dear Mr. Shelton:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (TAC 65685)

We have received and are reviewing your letter dated March 21, 1988 (No. 1500), containing supplemental information related to your application for license amendment dated August 7, 1987 (No. 1400). This information was submitted in response to our March 3, 1988, conference call. Subsequent to that conference call, we have determined the need for further additional information. The attachment to this letter identifies the information required.

The information requested affects fewer than ten respondents; therefore, OMB clearance pursuant to PL 95-511 is not required. Please provide your response to this request not later than April 30, 1988.

Sincerely,

/s/

Albert W. De Agazio, Project Manager
Project Directorate III-3
Division of Reactor Projects - III, IV, V & Special Projects

Enclosure:
As stated

cc: See next page

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REQUEST FOR ADDITIONAL INFORMATION
PLANT SYSTEMS BRANCH
DAVIS BESSE PROPOSED TECHNICAL SPECIFICATION CHNAGE
TO DELETE SFAS TO CERTAIN VALVES (TAC NO. 65685)

The following information is required in order for the staff to complete its review of the submittal by the Toledo Edison Company, dated August 7, 1987:

1. The proposed changes to the plant Technical Specifications (TS) in the licensee's letter dated August 7, 1988 will revise Table 3.3-5, Safety Features System Response Times to delete reference to the main steam warmup drain valves and atmospheric vent valves (AVV) receiving a high containment pressure or low reactor coolant system pressure SFAS automatic signal. It was indicated that the purpose of this change was to improve reliability and availability of the Main Feedwater System by reducing the chance of plant trips resulting from an inadvertent SFAS. The primary justification for this change was that those valves are normally closed during power operations. The SFAS signal serves to provide only a backup to procedural requirements for maintaining the valves in a closed position.

   The staff has two concerns with the above proposed TS change:

   (1) These valves are normally closed, and an automatic closure of these valves does not isolate the feedwater system. Therefore, how can the elimination of the SFAS automatic signal for MS warmup drain valves and AVVs improve reliability of the main feedwater system?

   (2) It is required in NUREG-0737, Item II.E.4.2 that following an accident all nonessential systems penetrating containment be automatically isolated. No credit can be given for operator action. By eliminating the SFAS state how this requirement is satisfied, or justify why those containment isolation valves can be granted a deviation from this requirement.

2. The proposed TS change will revise TS 3/4.3.2, Table 3.3-5 to delete reference to the atmospheric vent valves, main steam warmup drain valves, main steam isolation valves, main feedwater stop valves, and main steam line warmup valves receiving a manual SFAS. It was indicated in a telecon of March 3, 1988 between the licensee and staff that those valves were also listed in Table 3.6-2, Containment Isolation Valves, under TS section 3/4.6.3. Therefore, the licensee considered it redundant and unnecessary to list those valves in Table 3.3-5.

The staff finds that the surveillance requirements under TS 3/4.3.2 are not the same as the requirements under TS 3/4.6.3. For example a monthly CHANNEL FUNCTIONAL TEST is required by TS 3/4.3.2 but not required by TS 3/4.6.3. Identify the differences between these TS requirements and justify your proposed TS for the above valves.

3. The proposed change will revise TS section 3/4.3.6, Table 3.6-2 to delete isolation time requirements for the MSIV, MS warmup valves, MFW stop valves, AVV, MS warmup drain valves, and steam generator blowdown valves, along with the deletion of SFAS actuation. The licensee's evaluation of unreviewed safety question has been focused on large break LOCA and MSLB. The licensee should verify whether there are any other unidentified safety concerns or accident analyses that may be impacted by the proposed changes? For example, confirm the dose consequences for a steam generator tube rupture accident are within acceptable limits. Confirm that the environmental effects for a small MSLB inside or outside containment are not adversely affected. Verify that the small break LOCA accident analysis is not adversely affected by the proposed change. Provide additional discussion and/or analysis to justify that there is no unreviewed safety question resulting from the proposed change.