

5501 N. State Route 2
Oak Harbor, OH 43449

419-249-2300
FAX 419-321-8337

John K. Wood
Vice President - Nuclear
Davis-Besse

Docket Number 50-346

License Number NPF-3

Serial Number 2468

June 12, 1997

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555-0001

Subject: Updated Final Safety Analysis Report Initiatives and NRC Revised Enforcement Policy

Ladies and Gentlemen:

The NRC's revised NUREG-1600, Enforcement Policy, effective October 18, 1996, sets forth a two year enforcement discretion policy period applicable to voluntary licensee initiatives that identify and correct inconsistencies in the current Final Safety Analysis Report (FSAR). To qualify for enforcement discretion under the revised policy, licensees' FSAR improvement initiatives must be described in writing and publicly available. This letter describes the Davis-Besse Nuclear Power Station's (DBNPS) Updated FSAR (USAR) improvement initiatives.

USAR Improvement Program - Phase I

In June, 1996, the DBNPS initiated Phase I of a USAR Improvement Program. The purpose of this program was to ensure that the latest USAR revision, which reflected Cycle 10 and the Tenth Refueling Outage for DBNPS: accurately depicted the facility and its operation, contained the latest information developed, and reflected the licensing basis.

A DBNPS multi-disciplinary staff review of the USAR was conducted as part of Phase I of the USAR Improvement Program. Discrepancies identified between the USAR, the as-built plant, or operating procedures were evaluated and dispositioned. No unreviewed safety questions were identified during this review; however, one reportable condition was identified and reported in License Event Report (LER) 96-007, Control Room Emergency Ventilation System Design Basis Calculation Error. As a follow up to Phase I, a root cause evaluation is being performed under the DBNPS corrective action program to determine the cause of the discrepancies which were identified and to identify corrective action to prevent recurrence.

AD01
1/0

9706190041 970612
PDR ADOCK 05000346
P PDR



Design and Configuration Control Review

The DBNPS is also currently performing a systematic review of design and configuration control effectiveness for selected systems as described in the Nuclear Energy Institute (NEI) Formal Industry Initiative dated October 2, 1996. This self-assessment effort is being performed in accordance with the guidelines of NEI 96-05, "Guidelines for Assessing Programs for Maintaining the Licensing Basis." The Decay Heat/Low Pressure Injection System, Component Cooling Water System, Main Feedwater System and Containment Spray System were selected for review. This effort includes reviewing the USAR descriptions against the as-built systems and systems operation, and provides another opportunity to identify potential inconsistencies within the USAR.

Design Basis Validation Program

As described in its letter (Serial Number 2455) to the NRC, dated March 31, 1997, the DBNPS has commenced a Design Basis Validation Program. The purpose of this program is to provide further assurance that design basis information, specifically design basis calculations, are consistently reflected in the physical plant and controlled documents used to support plant operation, and contain sufficient information to support the underlying assumptions contained in the calculations. Design basis information will be reviewed to validate the safety design basis through a review of the DBNPS FSAR, the USAR, the NRC's Safety Evaluation Report and its supplement for the Operating License, the Operating License Technical Specifications (TS), and TS amendments' NRC Safety Evaluations. This provides an opportunity to identify potential inconsistencies between the USAR and design basis information.

USAR Improvement Program - Phase II

The DBNPS is currently developing Phase II of the USAR Improvement Program. The scope of this phase will encompass the following: the results of the root cause evaluation being conducted as an outcome of Phase I of the USAR Improvement Program, lessons learned from the NEI systematic review of the USAR, and applicable results from the Design Basis Validation Program. The goal of this phase will be to provide assurance the the USAR accurately reflects the current analysis, design, operation, and licensing basis of the facility.

Phase II of the USAR Improvement Program will be completed in support of the next revision of the USAR which is currently scheduled for November, 1998.

Toledo Edison believes the DBNPS USAR Improvement Program in conjunction with the NEI 96-05 effort and the Design Basis Validation Program, meets the NRC's criteria for granting enforcement discretion under the revised Enforcement Policy, and requests that the NRC apply such discretion should discrepancies be identified in the USAR.

Docket Number 50-346

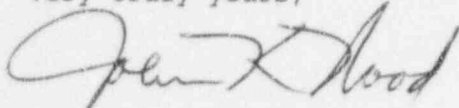
License Number NPF-3

Serial Number 2468

Page 3

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John K. Hood".

JMM/laj

cc: A. B. Beach, Regional Administrator, NRC Region III
A. G. Hansen, DB-1 NRC/NRR Project Manager
S. Stasek, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board