



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 109 TO FACILITY OPERATING LICENSE NO. NPF-3

TOLEDO EDISON COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

DOCKET NO. 50-346

1.0 INTRODUCTION

By letter dated January 22, 1986, as clarified by letters dated August 25 and December 28, 1987, January 15, 1988, and February 17, 1988, Toledo Edison Company (TED or the licensee) submitted an application for amendment to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. The application proposed certain revisions to the Technical Specifications (TS's) which would revise and clarify the duties and responsibilities of the Station Review Board (SRB). This would be accomplished by adding a new Section 6.5.3 which would specify how activities affecting nuclear safety should be conducted and by revising Sections 6.5.1.6 and 6.5.1.7 which would identify SRB responsibilities and SRB authority, respectively. Additionally, Section 6.8.2 would be modified and Section 6.8.3 would be deleted to eliminate material which would be included in the new Section 6.5.3 and modified Sections 6.5.1 and 6.5.1.7.

In addition to these proposed changes, the licensee also proposed deletion of an undefined term in Section 6.5.1.3 and a number of position title changes in various sections. With regard to the position title changes, the Commission issued Amendment No. 98 (February 18, 1987) which approved the proposed title changes.

2.0 EVALUATION

The licensee proposed that a new Section 6.5.3, "Technical Review and Control," be added to provide for technical review of changes to procedures and facilities and for the review of tests or experiments not covered in the Updated Safety Analysis Report (USAR) which affect the nuclear safety of the Davis-Besse facility. The new section would specify that procedures and facility changes or tests/experiments be reviewed by an individual or group different from the one which prepared the change or test. The new section would also specify that the individuals designated by the Plant Manager to perform the reviews must meet the qualification requirements of Sections 4.2, 4.3.1, 4.4 or 4.6 of ANSI Standard 18.1, 1971. Each review will include a determination of whether an unreviewed safety question as defined in 10 CFR 50.59 is involved. The new section would also provide for inter-disciplinary reviews when such reviews are deemed necessary.

The specification for temporary approval of changes to procedures, presently in TS Section 6.8.3, would be moved to this new Section 6.5.3 and reworded, but the approval authority would remain as before for changes which do not change the intent of the procedure. The proposed section would delete the specific requirement for SRB review of such changes. The licensee has stated that final review and approval by the SRB and Plant Manager is required within 14 days by station procedure.

The NRC staff has reviewed this new section and finds that it meets the requirements for independent reviews of facility changes of ANSI Standard N45.2.11-1974, Section 6, Design Verification, which is endorsed by the Commission in Regulatory Guide 1.64 and is committed to in the Toledo Edison Nuclear Quality Assurance Program. The same independent reviews of procedures and changes thereto, and of tests and experiments would also enhance the assurance of safety in these areas. The staff, therefore, finds this new section on technical review and control to be acceptable, on the condition that station procedures requiring final SRB review and approval within 14 days for temporary approvals to procedures are maintained in force.

The licensee also proposed to modify the responsibilities (Section 6.5.1.6) of the SRB and authority (Section 6.5.1.7) to bring them into agreement with the new Section 6.5.3. This would eliminate the SRB review of the strictly technical content of the proposed changes, but would retain SRB review of the safety related aspects of the change, including any unreviewed safety question determined during the technical review or during the SRB review. For changes where an unreviewed safety question exists, the SRB would perform a technical review as well as a safety review. The staff has reviewed these proposed changes and has found that the licensee's proposed deletion of existing item e of Section 6.5.1.6 is not acceptable, however, the remaining proposed changes to Section 6.5.1.6 are found to be acceptable. Therefore, the following changes are approved for incorporation into the TS's.

- Replacement of existing items a through d with the licensee's proposed items a through d.
- Deletion of existing items f through j and replacement with the licensee's proposed items e through i (but relettered f through j).
- The licensee's proposed item f is modified to delete a redundant reference to Technical Specifications because this specific requirement is retained in item e.
- Incorporation of proposed items j through m (but relettered k through n).
- Relettering of existing items k through o as items o through s.
- Modification of Section 6.8.2 relating to changes to procedures to delete the specification of review and approval requirements (which are now included in the new Section 6.5.3) and add reference to the requirements of Section 6.5.3.

-Deletion of Section 6.8.3 dealing with changes and approvals to temporary procedure changes, since these requirements are specified in new Section 6.5.3.

The licensee proposed modifications to Sections 6.5.1.7.a and 6.5.1.7.b to be consistent with the revised responsibilities proposed in Section 6.5.1.6. The staff finds the licensee's proposed changes acceptable except that, consistent with the staff's denial to delete item 6.5.1.6.e, that item is retained in Section 6.5.1.7.b. (The licensee's proposal is also relettered to be consistent with the relettering of the items in Section 6.5.1.6.)

The licensee proposed to add an additional SRB Authority. Specifically, the SRB would recommend to the Plant Manager that an action reviewed under Section 6.5.1.6.b does not constitute an unreviewed safety question. The staff finds the additional requirement acceptable.

The licensee proposed to delete the undefined phrase "to serve on a temporary basis" from Section 6.5.1.3. The staff finds the deletion acceptable.

The staff has compared the licensee's proposed changes to the acceptance criteria set forth in Section 13.4 of the Standard Review Plan (NUREG-0800) and finds that the proposed changes are consistent with those criteria. These changes are similar to changes previously approved by the staff for other facility TS's.

The denial to delete item e, Section 6.5.1.6, by the staff is based upon the concern that there should be adequate assurance that the results of investigations of Technical Specification violations are brought to the attention of responsible corporate management. The licensee's proposal to delete this requirement would be inconsistent with TS's recently approved for other facilities by the NRC and is inconsistent with current Standard Technical Specifications.

### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: March 9, 1988