



A Centenor Energy Company

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Docket No. 50-346

License No. NPF-3

Serial No. 1508

April 29, 1988

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

Subject: Resolution of NRC Comments Related to License Amendment Request  
Regarding Deletion of Auxiliary Feedwater Pump Turbine Inlet Steam  
Pressure Interlock Operability Requirements (TAC No. 65374)

Gentlemen:

In a telephone conversation between NRC (A. W. DeAgazio, NRC/NRR Davis-Besse Nuclear Power Station Unit No. 1 Project Manager, and N. Wagner, NRC Staff) and Toledo Edison (TED) representatives on April 6, 1988, TED proposed resolution to NRC comments previously received concerning the subject License Amendment Request. These comments involved reservations the staff had regarding the deletion of the Auxiliary Feedwater Pump Turbine (AFPT) Inlet Steam Pressure Interlocks from the Technical Specifications, as proposed by Serial No. 1377 dated May 4, 1987, based on the credit taken for the interlocks as part of the Environmental Qualification Program.

Enclosure 2 to this letter provides TED's discussion of and proposed revisions to the Technical Specification pages for the resolution discussed in the above referenced conversation. This resolution is considered additional information within the scope of the original application as submitted by Serial No. 1377 and requires no license fee per 10CFR170.12.

Very truly yours,

RMC:tlt

Enclosures

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PDR ADOCK 05000346  
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cc: A. B. Davis, Regional Administrator  
DB-1 Resident Inspector  
A. W. DeAgazio, DB-1 Project Manager  
State of Ohio

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ADDITIONAL INFORMATION TO  
APPLICATION FOR AMENDMENT  
TO  
FACILITY OPERATING LICENSE NO. NPF-3  
FOR  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NO. 1

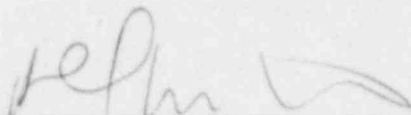
Attached is additional information related to the License Amendment Application regarding deletion of the Auxiliary Feed Pump Turbine Inlet Steam Pressure Interlocks, previously submitted on May 4, 1987 (Serial No. 1377).

The proposed Technical Specification changes affected by this additional information (submitted under cover letter Serial No. 1508) concern:


Technical Specification 3/4.7.1.2, Auxiliary Feedwater System

Technical Specification Bases Section 3/4.7.1.2, Auxiliary Feedwater Systems

By:

  
D. C. Shelton, Vice President, Nuclear

Sworn and subscribed before me this 29th day of April, 1988.

  
Notary Public, State of Ohio

My Commission expires

5/15/91

Discussion of Resolution to NRC Comments Related to Toledo Edison's  
Proposed License Amendment Request Regarding Deletion of Auxiliary  
Feedwater Pump Turbine Inlet Steam Pressure Interlock Operability  
Requirements.

In a telephone conversation on March 24, 1988 between the NRC (A. W. DeAgazio, NRC/NRR Davis-Besse Nuclear Power Station (DBNPS) Unit No. 1 Project Manager) and TED, comments were provided regarding the License Amendment Request (LAR) concerning deletion of the Auxiliary Feedwater Pump Turbine (AFPT) Inlet Steam Pressure Interlock operability requirements from Technical Specification 4.7.1.2d (Serial No. 1377, dated May 4, 1987). These comments pertained to the NRC Staff's review of the Impell Report No. 02-1040-1334, Revision 0, "Evaluation of Environmental Conditions from Auxiliary Feedwater Pump Turbine Steam Supply Line Ruptures", November 1985, as was referenced in the LAR.

Subsequent discussion on March 30, 1988, revealed the concerns could be alleviated if the interlocks were to remain in the Technical Specifications. TED re-emphasized that the interlocks were only required for environmental qualification concerns and, therefore, Auxiliary Feedwater System (AFWS) operability should not be related to the interlock operability. It was noted by TED that the operability of this interlock was required only when the lines were pressurized above 275 psig, based on the criteria for high energy lines provided in the Updated Safety Analysis Report, Section 3.6. Further, since the interlock is only required for mitigation of high energy line break consequences, a greater action time should be allowed in the event of inoperability of the interlock.

In a telephone conversation on April 6, 1988, TED proposed the following specific items to resolve the NRC concerns:

- 1) The existing Surveillance Requirement number 4.7.1.2 would be revised to 4.7.1.2.1, and, based on the new numbering, Surveillance Requirement 4.7.1.2.1d would be revised to delete the AFPT Inlet Steam Pressure Interlocks surveillances and to remove these interlocks from AFWS operability considerations. However, the AFPT Inlet Steam Pressure Interlocks would be included in a separate Surveillance Requirement numbered 4.7.1.2.2 that would require operability of the interlocks when the steam line pressure is greater than 275 psig. This would allow the interlock pressure switches to be set at a higher setpoint to accommodate the high energy line break (HELB) concerns, and not be required to be operable for all conditions for which the AFWS is required to be operable. The higher trip setpoint is also expected to alleviate the interlock pressure switch (manufactured by Static-O-Ring) setpoint drift which occurs when the switch is calibrated at the lower end of its range. Also included in this separate Surveillance Requirement is a delineation of the maximum allowable time following exceedance of 275 psig that will be permitted to perform the interlocks' surveillances.

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- 2) A new Action Statement b. would be added to Specification 3.7.1.2 for the AFPT Inlet Steam Pressure Interlocks as follows:

b. With any Auxiliary Feed Pump Turbine Inlet Steam Pressure Interlocks inoperable, restore the inoperable interlocks to OPERABLE status within 7 days or be in HOT SHUTDOWN within the next 12 hours.

The new Action Statement would allow a longer action time to remedy the condition where any AFPT Inlet Steam Pressure Interlocks are inoperable, and is justified by the probability of a HELB being lower than the probability of an event which would require AFWS actuation. This is consistent with the classification of events presented in the Updated Safety Analysis Report (USAR), Chapter 15. This chapter of the USAR defines a Loss of Normal Feedwater event (which would result in AFWS actuation) as a Class I event, or an abnormal operational transient, and defines a Steam Line Break event (which includes the AFPT steam supply line) as a Class III event, or an accident which has very low probability. Therefore, the increased action time for restoring any inoperable AFPT Inlet Steam Pressure Interlock to operable status is justified.

- 3) The Bases for Section 3/4.7.1.2 would be revised to include a statement as follows:

The OPERABILITY of the Auxiliary Feed Pump Turbine Inlet Steam Pressure Interlocks is required only for high energy line break concerns and does not affect Auxiliary Feedwater System OPERABILITY.

This statement in the Bases would clearly indicate the interlocks are not associated with AFWS operability.

The marked up Technical Specification pages are included as part of this enclosure and reflect the above cited discussion.