



A Centenor Energy Company

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Docket No. 50-346

License No. NPF-3

Serial No. 1532

June 9, 1988

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

Subject: Emergency Response Technical Support Center at the Davis-Besse
Nuclear Power Plant

Dear Gentlemen:

On April 28, 1988, a meeting was held at the Davis-Besse site between Toledo Edison and representatives of the NRC from both NRR and Region III. The purpose of the meeting was to discuss the Davis-Besse Emergency Response Facilities (ERF). Included in this discussion was the Plant Control Center planned improvement to enhance in-plant response for potential events including both transients and classifiable emergencies. A tour of several facilities, including the Technical Support Center (TSC), was also conducted.

During the course of the meeting, the fact that the location of the TSC deviated from the guidelines set forth in NUREG-0737 Supplement 1 was discussed. This is a result of the centralized accident management concept developed at Toledo Edison for emergency response. During the course of the design and construction of the ERF, which occurred prior to NRC guideline publication, Toledo Edison met on several occasions with various representatives of the NRC to keep them apprised of our decisions and justifications. Since completion of the facilities, numerous emergency response exercises have been held. Evaluations of those exercises made no indication that the location of the TSC in any way hampered the plant's ability to cope with the simulated emergency. The NRC representatives acknowledged that the communication links between the plant and the TSC were exceptional. This continued positive performance further validates the acceptability of the original concept and location. Exceptions for TSCs outside the owner controlled area have been granted by the NRC for several other Licensees.

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Toledo Edison believes its existing Emergency Response Facilities, including the TSC location, are acceptable. The discussion provided in meeting our response to NUREG-0737 Supplement 1 (dated April 15, 1983 Serial No. 933) and its referenced documents should provide acceptable basis for your review and approval.

Very truly yours,

DC Shelton

KLB:tlt

cc: A. B. Davis, Regional Administrator (2 copies)
DB-1 Resident Inspector