

Guy G. Campbell
Vice President - Nuclear419-321-8588
Fax: 419-321-8337

Docket Number 50-346

License Number NPF-3

Serial Number 2589

March 19, 1999

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

Subject: Withdrawal of Proposed Action Statement from License Amendment Application to Relocate a Surveillance Requirement from Technical Specification (TS) 3/4.6.5.1 "Emergency Ventilation System," to TS 3/4.6.5.2, "Shield Building Integrity" (LAR 98-0010)

Ladies and Gentlemen:

The purpose of this letter is to withdraw a portion of a previously submitted application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License Number NPF-3, Appendix A, Technical Specifications (TS). This application for an amendment to revise TS 3/4.6.5.1, "Emergency Ventilation System," 3/4.6.5.2, "Shield Building Integrity," and the associated Bases, was submitted to the Nuclear Regulatory Commission (NRC) by letter (Serial Number 2557) dated October 27, 1998. Specifically, this application requested the addition of a new Action "b" to TS 3.6.5.2. This letter requests the withdrawal of this proposed new Action "b."

This license amendment application proposed relocating existing TS Surveillance Requirement (SR) 4.6.5.1.d.4, that requires verifying shield building integrity by testing the capability to produce a negative pressure within the shielded building annulus, to TS 3/4.6.5.2. The proposed relocation of SR 4.6.5.1.d.4 from TS 3/4.6.5.1 to TS 3/4.6.5.2 would appropriately align this Surveillance Requirement with the Shield Building Integrity TS and its associated Bases. This relocation would be similar to the NRC guidance contained in the improved "Standard Technical Specifications for Combustion Engineering Plants" (NUREG-1432, Revision 1) and "Standard Technical Specifications for Westinghouse Plants" (NUREG-1431, Revision 1). This TS change would also result in allowing up to twenty-four hours to restore the shield building's ability to maintain the required negative pressure (e.g., restore a broken door or blowout panel of TS Table 4.6-1) prior to requiring initiation of a plant shutdown.

The proposed license amendment also requested that a new Action "b" be added to TS Limiting Condition for Operation (LCO) 3.6.5.2. This proposed Action stated that the provisions of

1/
A001

Docket Number 50-346
License Number NPF-3
Serial Number 2589
Page 2

Specification 3.6.5.1 Emergency Ventilation System (EVS) would not apply should shield building integrity not be achieved. This new Action "b" was proposed since the DBNPS TS are based on the original Standard Technical Specifications, which "cascade," while the improved Standard Technical Specifications are written not to cascade.

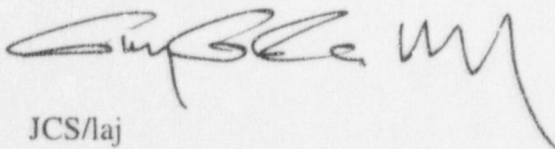
Subsequent to this submittal, telephone conference calls were held on February 19 and 22, 1999, between the staffs of the NRC and the DBNPS to discuss the details of this proposed license amendment. It was determined that the addition of the new Action "b" was unnecessary. The proposed relocation of the shield building negative pressure test to TS 3.6.5.2, and the amendment application's proposed clarification of the EVS and shield building integrity Bases sections provide sufficient clarification to prevent "cascading" to the EVS TS 3.6.5.1 should shield building integrity be lost. In the event that the negative pressure test of SR 4.6.5.2.2, or the inspection of the doors or blowout panels under SR 4.6.5.2.1 could not be completed satisfactorily, TS LCO 3.6.5.2 would be entered which allows up to 24 hours to restore shield building integrity.

Accordingly, since the proposed Action "b" is not necessary, it is being withdrawn from the proposed license amendment. The October 27, 1998, license amendment application concluded that the proposed changes have no adverse effect on safety, that the proposed changes do not involve a significant hazards consideration and that the proposed changes do not constitute an unreviewed safety question. The withdrawal of proposed Action "b" does not affect these conclusions.

Attached are the proposed changes to the DBNPS Technical Specifications as provided in the October 27, 1998, submittal, reflecting the withdrawal of Action "b." Approval of the license amendment application is requested by April 30, 1999.

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,



JCS/laj

Attachment

cc: J. E. Dyer, Regional Administrator, NRC Region III
A. G. Hansen, NRC/NRR Project Manager
J. R. Williams, Chief of Staff, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
K. S. Zellers, DB-1 (Acting) NRC Region III, DB-1 Senior Resident Inspector
Utility Radiological Safety Board