



A Centenor Energy Company

Docket Number 50-346

License Number NPF-3

Serial Number 1684

June 10, 1989

DONALD C. SHELTON  
Vice President—Nuclear  
(419) 249-2300

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

Subject: License Amendment Request to Increase Snubber Surveillance Interval  
(TAC Number 72816)

Gentlemen:

Toledo Edison submitted a license amendment request (Serial Number 1646, dated May 26, 1989), which proposed a revision to Davis-Besse Nuclear Power Station (DBNPS) Technical Specification (TS) Surveillance Requirement (SR) 4.7.7.2. The current surveillance requirement stipulates 10 percent of the snubbers to be tested every 18 months. The proposed change would allow the snubber functional test surveillance interval to be increased to a maximum of 30 months with a corresponding increase in the snubber test sample size. The proposed change would also remove the applicability of the 1.25 and 3.25 surveillance frequency extension provisions of TS 4.0.2 from the SR. Currently, due to the limitations of TS 4.0.2b (3.25 factor) the snubber functional test, which was last completed on September 14, 1988, is due to be completed on September 15, 1989. In letter Serial Number 1646, Toledo Edison requested that the Nuclear Regulatory Commission (NRC) approve the amendment by July 31, 1989, to prevent a plant shutdown solely for the purpose of performing the required testing.

In a telephone call initiated by Toledo Edison as to the status of the subject request, Mr. T. V. Wambach, NRC/NRR Senior Project Manager, on June 13, 1989, informed Toledo Edison that the full scope approval of this amendment request may be held in abeyance due to the near term issuance of a new ANSI standard on snubber testing and, subsequently, a NRC Generic Letter. In the event that the NRC staff determines that the full scope of Toledo Edison's request would be impacted by the planned Generic Letter, the requested amendment should be issued as a one-time extension in order to avoid a plant shutdown solely for the purpose of performing the snubber functional tests. While Toledo Edison considers that the proposed changes and supporting evaluations would remain valid after a new standard and Generic Letter are issued, a one time approval of the change would also avoid shutdown solely to perform the snubber testing.

The DBNPS sixth refueling outage is presently scheduled to commence on February 1, 1990, and the snubber functional testing under such an approval would be conducted during the refueling outage. A normal 18 month functional

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test would not be required to be completed before March 15, 1990, (after commencement of the planned refueling outage), but the TS 4.0.2b limitation is requiring the functional testing within a 12 month period with the test being due September 15, 1989. A review of previous snubber functional test results showed an average snubber failure rate of approximately 6 percent (i.e., total number failed divided by the total number tested). Each snubber failure requires an additional 10 percent of the snubbers in its group to be tested and the failure to be evaluated (TS 4.7.7.2d). Similar to the request of Serial Number 1646, this requirement would not be affected by the one-time extension.

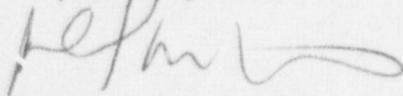
This one-time extension is bounded by the Technical Description and Significant Hazards Consideration provided in the May 26, 1989, license amendment request. As previously proposed by Toledo Edison, and under a one-time extension, an increase in the surveillance interval will result in an increase in the snubber test sample size for the current test interval. Enclosed is a marked up Technical Specification page, 3/4 7-23, reflecting a one-time extension.

Toledo Edison will review and evaluate the NRC Generic Letter which will propose Technical Specification changes based on the new ANSI standard on snubbers following its issuance, but considers that the same review and evaluation could also adequately take place after NRC approval of the license amendment request in its entirety proposed in Serial Number 1646. Therefore, Toledo Edison encourages the NRC to issue the license amendment as originally requested, but acknowledges that issuance of a one time extension would be acceptable in order to prevent a shutdown.

It should be noted that Toledo Edison previously requested (Serial Number 1588, dated October 31, 1988), the applicability of TS 4.0.2b be deleted from 18 month and refueling surveillance requirements throughout the TS (which would have included TS 4.7.7.2). Nuclear Regulatory Commission approval of that request would also prevent this shutdown. However, NRC approval of that amendment request has also been impacted by the planned near term issuance of another Generic Letter, which has not been issued at the time of this letter. Toledo Edison encourages the NRC to expeditiously proceed with action on the deletion of TS 4.0.2b.

Should further information be required, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,



GBK/dlm

Enclosure

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
T. V. Wambach, DB-1 NRC Senior Project Manager  
State of Ohio