



*Energy Harbor Nuclear Corp.
Davis-Besse Nuclear Power Station.
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419-321-7676

March 21, 2022
L-22-059

10 CFR 50.55a

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject:
Davis-Besse Nuclear Power Station
Docket No. 50-346, License No. NPF-3
Response to Request for Additional Information on Proposed Inservice Test Alternative RP-3 (EPID L-2021-LRR-0072)

By letter dated September 20, 2021 (Agencywide Document Access and Management System (ADAMS) Accession Number ML21263A193), Energy Harbor Nuclear Corp. submitted relief request RP-3 for the fifth inservice testing (IST) interval at Davis-Besse Nuclear Power Station, Unit No. 1. In accordance with 10 CFR 50.55a(f)(5)(iii), Energy Harbor Nuclear Corp. requested relief from certain IST requirements for two emergency diesel generator fuel oil transfer pumps on the basis that performing these tests is impractical.

By electronic mail dated February 23, 2022, the Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI) to support the review of the proposed alternative. The Energy Harbor Nuclear Corp. RAI response is attached.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Manager - Fleet Licensing, at (330) 696-7208.

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Sincerely,



Terry J. Brown

Attachment: Response to Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Utility Radiological Safety Board

Attachment
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Response to Request for Additional Information
Proposed Inservice Test Alternative RP-3
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By letter dated September 20, 2021 (Agencywide Document Access and Management System (ADAMS) Accession Number ML21263A193), Energy Harbor Nuclear Corp. (EHNC) submitted relief request RP-3 for the fifth inservice testing (IST) interval at Davis-Besse Nuclear Power Station, Unit No. 1. In accordance with 10 CFR 50.55a(f)(5)(iii), EHNC requested relief from certain IST requirements for two emergency diesel generator fuel oil transfer pumps on the basis that performing these tests is impractical. By electronic mail dated February 23, 2022, the Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI) to support the review of the proposed alternative. The requested information is provided below. Each RAI is presented in bold font, followed by the EHNC response.

RAI-1

Describe the preventive maintenance performed on the fuel oil transfer pumps.

Response:

The preventative maintenance activities direct removal of the fuel oil transfer pumps from the fuel oil storage tanks so they can be cleaned and inspected, along with their suction strainer. There are also contingent activities to replace the discharge filter if inspection determines replacement is warranted. These preventative maintenance activities are performed on a 48-month frequency.

RAI-2

Provide a summary of the IST results for each fuel oil transfer pump for the past 10 years. Discuss any failures of these pumps that have occurred.

Response:

Fuel Oil Transfer Pump P195-1		Fuel Oil Transfer Pump P195-2	
Test Date	Flow Rate (gpm)	Test Date	Flow Rate (gpm)
3/5/2013	14.38	5/22/2012	14.7
9/26/2014	16.1	6/11/2014	13.9
1/15/2015	16.03	6/15/2016	16.7
11/15/2016	14.3	11/1/2017	15.1
12/14/2018	17.18	10/2/2019	15.27
10/7/2020	16.65	10/1/2021	15.1

No pump test failures have occurred in the past 10 years.

RAI-3

Provide a comparison of the actual flow rates versus the licensed minimum flow rates for the fuel oil transfer pumps.

Response:

The fuel oil transfer pumps are rated at 10 gallons per minute (gpm). Actual pump flow rates are provided in the response to RAI-2. The minimum flow rate used for test acceptance is 6 gpm. The calculated consumption rate for the emergency diesel generator at maximum power output is 3.6 gpm. Therefore, the test acceptance minimum flow rate (6 gpm) is conservative relative to the maximum required pump flow rate (3.6 gpm).