

Energy Harbor Nuclear Corp. Davis-Besse Nuclear Power Station. 5501 N. State Route 2 Oak Harbor, Ohio 43449

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June 22, 2022 L-22-098

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 <u>Withdrawal of Proposed Inservice Inspection Alternative RR-A2 (EPID</u> L-2021-LRR-0067)

By letter dated September 13, 2021 (ADAMS Accession No. ML21256A119) and in accordance with 10 CFR 50.55a(z)(1), Energy Harbor Nuclear Corp. submitted a request for a proposed alternative to certain requirements of inservice inspection (ISI) to the American Society of Mechanical Engineers, Section XI, Table IWB-2500-1, Examination Category B-B, and Table IWC-2500-1, Examination Category C-A and C-B for use at Davis-Besse Nuclear Power Station (DBNPS). The proposed alternative is to increase the inspection interval for the items from 10 years to 30 years. A supplement to this request was provided by letter dated January 27, 2022 (ADAMS Accession No. ML22027A770) in response to an NRC staff request for additional information (RAI).

By electronic mail dated April 28, 2022, the NRC staff requested additional information regarding the response to RAI-12 to complete the review of the proposed alternative. The April 28, 2022 RAI states, in part, that the NRC staff has determined that, when considering extended examination intervals, adequate performance monitoring through inspections is needed to ensure that the probabilistic fracture mechanics (PFM) model continues to predict the material behavior (of the subject components) and that emergent degradation is discovered and dispositioned in a timely fashion. The RAI is to describe the performance monitoring that will be implemented and justify that this performance monitoring will provide, over the extended examination interval, (1) direct evidence of the presence and extent of degradation, (2) validation and confirmation of the continued adequacy of the PFM model, and (3) timely detection of novel or unexpected degradation. Any actions that will be taken if issues are identified through this performance monitoring are to be described.

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Based on recent industry precedence, Energy Harbor Nuclear Corp. is evaluating the benefits of the request with the inclusion of a performance monitoring plan. Therefore, Energy Harbor Nuclear Corp. has decided to withdraw the proposed inservice inspection alternative RR-A2 at this time.

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.

Sincenely,

/Brown

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