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Docket Number 50-346

License Number NPF-3

Serial Number 2626

November 9, 1999

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

Subject: Comments on Preliminary Accident Sequence Precursor Analysis for the
October 14, 1998 Operational Event at the Davis-Besse Nuclear Power Station, Unit
Number 1

Ladies and Gentlemen:

The Davis-Besse Nuclear Power Station (DBNPS) received the Nuclear Regulatory Commission letter, Review of Preliminary Accident Sequence Precursor Analysis of Operational Condition (Log Number 5552) for the operational event that occurred at the DBNPS on October 14, 1998. This letter was received on October 11, 1999, and requested that comments for the Preliminary Accident Sequence Precursor (PASP) analysis be submitted within 30 days of receipt of the letter.

Scenario 3, described on page 4 of the PASP analysis report, assumes that a reactor coolant pump (RCP) seal Loss of Coolant Accident (LOCA) could occur as the result of a seal rupture, if the operators successfully trip the RCPs. This is not consistent with the seal failure model used in the DBNPS Probabilistic Safety Assessment (PSA). The seal failure model used by DBNPS is described in detail in the DBNPS Individual Plant Evaluation (IPE), Part 3, Section 4.4.3 submitted on February 26, 1993 (DBNPS Serial Number 2119). The DBNPS IPE concludes, based on testing and the design of the Byron Jackson RCP seal, that the seals will not experience gross leakage due to loss of support systems as long as operators take appropriate action to trip the RCPs (Reference DB-OP-02523, Component Cooling Water System Malfunctions). The DBNPS PSA model incorporates this conclusion by assuming a RCP seal LOCA only if plant operators fail to trip the affected RCP. This approach is consistent with other plants using Byron Jackson pumps and the same model/design seals. For the October 14, 1998 event, the RCPs were tripped upon loss of Component Cooling Water; therefore, a RCP seal LOCA need not be assumed in the analysis of this event.

The comments provided herein should be reflected in the analysis discussion and cut sets to ensure that the correct characterization of the plant design and the event are portrayed.

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If you have any questions, or require further information, please contact Mr. James L. Freels,
Manager - Regulatory Affairs at (419) 321-8466.

Very truly yours,

A handwritten signature in black ink, appearing to read 'DLM/dlc', written in a cursive style.

DLM/dlc

Enclosure

cc: S. N. Bailey, DB-1 NRC/NRR Project Manager
J. E. Dyer, Regional Administrator, NRC Region III
K. S. Zellers, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Manager – Regulatory Affairs (419-321-8466) at Davis-Besse of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

None

N/A