

Docket Number 50-346
License Number NPF-3
Serial Number 2615
Enclosure 1
Page 1

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NUMBER NPF-3
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

Attached are the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 2615) concern:

Appendix A, Technical Specifications (TS):

TS Index,	Pages XV and XVI
TS 6.5.1,	Station Review Board
TS 6.5.2,	Company Nuclear Review Board

I, G. G. Campbell, state that (1) I am Vice President - Nuclear of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification on behalf of the Toledo Edison Company and The Cleveland Electric Illuminating Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.

By: 
G. G. Campbell, Vice-President - Nuclear

Affirmed and subscribed before me this 8th day of November, 1999.


Notary Public, State of Ohio - Nora L. Flood
My commission expires September 4, 2002.

Docket Number 50-346
License Number NPF-3
Serial Number 2615
Enclosure 1
Page 2

The following information is provided to support issuance of the requested amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License NPF-3, Appendix A, Technical Specifications (TS). The amendment request involves changes to (TS) 6.5.1, Station Review Board (SRB), and TS 6.5.2, Company Nuclear Review Board (CNRB).

- A. Time Required to Implement: These changes are to be implemented within 120 days after NRC issuance of the License Amendment.
- B. Reason for Change (License Amendment Request 99-0003): This License Amendment Request proposes relocating TS 6.5.1, SRB, and TS 6.5.2, CNRB, to DBNPS Updated Safety Analysis Report (USAR) Chapter 17.2, Quality Assurance During the Operation Phase.

These changes are proposed as line item TS improvements as provided by the NRC in the improved "Standard Technical Specifications - Babcock and Wilcox Plants," NUREG-1430, Revision 1, dated April, 1995. Additionally, the proposed changes to TS 6.5.1 and 6.5.2 are consistent with the recommendations of NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

- C. Safety Assessment and Significant Hazards Consideration: (See Attachment).

Docket Number 50-346
License Number NPF-3
Serial Number 2615
Attachment

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST 99-0003

(16 pages follow)

**SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER
99-0003**

TITLE:

Relocate Technical Specification 6.5.1, Station Review Board, and Technical Specification 6.5.2, Company Nuclear Review Board, to the Updated Safety Analysis Report Quality Assurance Program

DESCRIPTION:

This License Amendment Request proposes relocating Operating License Appendix A, Technical Specification (TS) 6.5.1, "Station Review Board (SRB)," and TS 6.5.2, "Company Nuclear Review Board (CNRB)," to Davis-Besse Nuclear Power Station (DBNPS) Updated Safety Analysis Report (USAR) Chapter 17.2, "Quality Assurance During the Operations Phase," also known as the Quality Assurance Program.

As described below, these changes are being proposed consistent with Nuclear Regulatory Commission (NRC) generic guidance on improving the content of the TS. These proposed changes would:

- Relocate the requirements of TS 6.5.1, SRB, to the Quality Assurance Program described in Chapter 17 of the DBNPS USAR. These requirements include:
 - Function of the SRB
 - Composition
 - Use of Alternates on the SRB
 - Meeting Frequency
 - Quorum
 - Review and Investigation Responsibilities
 - Authority of the SRB
 - Recordkeeping

- Relocate the requirements of TS 6.5.2, CNRB, to the Quality Assurance Program described in Chapter 17 of the DBNPS USAR. These requirements include:
 - Function of the CNRB
 - Composition
 - Use of Alternates on the CNRB
 - Use of Consultants
 - Meeting Frequency
 - Quorum

- Review Responsibilities
- Audit Responsibilities
- Authority of the CNRB
- Recordkeeping

The marked up TS 6.5.1 and TS 6.5.2 are attached and show the requirements that would be removed and relocated to the Quality Assurance Program. Pages XV and XVI of the TS Index would be revised to reflect this relocation.

The above changes are proposed as line-item TS improvements as provided by the NRC in the improved "Standard Technical Specifications - Babcock and Wilcox Plants," NUREG-1430, Revision 1, dated April, 1995. The NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," dated July 22, 1993, recognized the benefit in allowing licensees to improve portions of their TS by relocating certain requirements from the TS to licensee-controlled documents, such as the USAR. This approach results in greater consistency in TS content and allows for the most efficient use of NRC and industry staff resources in processing future TS changes.

Additionally, the proposed changes to TS 6.5.1 and TS 6.5.2 are consistent with NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995, (DBNPS letter Log Number 4661).

These requirements would be relocated in their entirety to the USAR Chapter 17 Quality Assurance Program with changes only to the format. Relocating requirements from TS 6.5.1, SRB, and TS 6.5.2, CNRB, to the USAR Chapter 17 Quality Assurance Program will be completed no later than the implementation of the NRC-approved License Amendment that allows for their removal from the TS. As described below, future changes to these relocated TS will then be subject to the regulatory controls of 10 CFR 50.54(a), including the providing of changes to the NRC.

SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED:

The function of the SRB is to advise the Plant Manager on matters related to nuclear safety. The function of the CNRB is to provide independent review and audit of designated activities, and to advise the Vice President – Nuclear regarding these activities.

This proposed license amendment is administrative in nature and does not affect the function of the SRB or CNRB, or any plant systems, structures or components. The proposed license amendment would administratively affect the location of requirements now located in TS 6.5.1 (SRB) and TS 6.5.2 (CNRB).

FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The overall function of the Operating License, Appendix A, Technical Specifications is to impose those conditions or limitations upon reactor operation necessary to preserve the validity of the results of the USAR design bases accidents. The function of the TS Section 6.0,

“Administrative Controls,” as stated in 10 CFR 50.36(c)(5) is to provide provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure plant operation in a safe manner.

The function of the present TS 6.5.1 is to describe the activities of the SRB, including the SRB’s function, composition, use of alternates, meeting frequency, quorum, review and investigation responsibilities, authority, and recordkeeping.

The function of the present TS 6.5.2 is to describe activities of the CNRB including the CNRB’s function, composition, use of alternates, use of consultants, meeting frequency, quorum, review responsibilities, audits, authority, and recordkeeping.

The functions described in the individual TS are not affected by the proposed changes to relocate the requirements to the USAR Chapter 17 Quality Assurance Program.

EFFECTS ON SAFETY:

The NRC regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. 10 CFR 50.36(c)(5) states, in part:

Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

The NRC’s “Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors,” dated July 22, 1993, provides guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the NRC’s Final Policy Statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. This is accomplished by identifying those features that are of controlling importance to nuclear safety and establishing on them certain conditions of operation which cannot be changed without prior NRC approval.

The NRC’s Final Policy Statement recognized, as had previous statements related to the NRC staff’s TS Improvement Program, that implementation of the policy would result in the relocation of some existing TS requirements to licensee-controlled documents, such as the USAR. The relocation of TS requirements in cases where adequate controls are provided by other regulatory methods can reduce the resources expended by licensees and the NRC staff in preparing and reviewing license amendment requests.

Further guidance was provided to licensees in Administrative Letter 95-06, “Relocation of Technical Specification Administrative Controls Related to Quality Assurance,” dated December 12, 1995. This Administrative Letter concluded that TS administrative quality assurance-related requirements may be relocated to licensee-controlled quality assurance programs. The Quality Assurance Program is a logical candidate for such relocations due to the controls imposed by

such NRC regulations as Appendix B to 10 CFR Part 50 and the established quality assurance program change control process in 10 CFR 50.54(a).

In addition to the Quality Assurance Program of USAR Chapter 17, certain audit requirements listed in TS 6.5.2 are also required by the Code of Federal Regulations (CFR). For example, audit requirements are stipulated in 10 CFR Part 50, Appendix B, Criterion XVIII (audits); 10 CFR 50.54(t) (emergency preparedness program); 10 CFR 50.54(p) (security contingency plan); and 10 CFR 73.46 (g) (security program). USAR Section 13.4.1, "Station Review Board," also describes the function of the SRB and its duties. Similarly, USAR Section 13.4.2, "Company Nuclear Review Board," describes the function of the CNRB and its duties. Changes to these sections of the USAR are subject to the regulatory requirements of 10 CFR 50.59.

Utilizing the above guidance, the proposed changes to DBNPS TS 6.5.1, SRB, and TS 6.5.2, CNRB, remove the SRB and CNRB quality assurance-related TS requirements consistent with the improved Standard Technical Specifications (NUREG-1430, Revision 1) and NRC Administrative Letter 95-06. The proposed changes are administrative in nature and do not affect assumptions contained in the plant safety analysis, the physical design, and/or operation of the plant, nor do they affect TS that preserve safety analysis assumptions. The functions described in the individual TS are not affected by their proposed relocation to the USAR Quality Assurance Program and will continue to be performed. The TS Index proposed changes are administrative and reflect the relocation of TS 6.5.1 and TS 6.5.2. In summary, these are administrative changes that do not reduce the duties or responsibilities of the SRB and CNRB in ensuring the safe operation of the DBNPS. Accordingly, there is no adverse effect on nuclear safety as a result of these changes.

FENOC Quality Assurance Program:

It may be noted that under a separate licensing action request submitted to the NRC under letter Serial Number 2603 (dated August 19, 1999) pursuant to 10 CFR 50.54(a), the DBNPS requested that the DBNPS Quality Assurance Program in USAR Section 17.2 be replaced by the FirstEnergy Nuclear Operating Company (FENOC) Quality Assurance Program Manual (QAPM). The FENOC QAPM is designed to serve as the governing Quality Assurance Program for the nuclear facilities within the FENOC organization. Following NRC approval, the FENOC QAPM will be adopted as the USAR Section 17.2 DBNPS Quality Assurance Program replacing the current QA Program. The information being relocated from TS 6.5.1 and TS 6.5.2 will be incorporated in its entirety into the governing DBNPS Quality Assurance Program document, whether it is the current program contained in USAR Section 17.2, or the FENOC QAPM. Therefore, the adoption of the FENOC QAPM will not impact these changes being proposed in this License Amendment Request.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in

the probability or consequences of an accident previously evaluated: (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. The Davis-Besse Nuclear Power Station has reviewed the proposed changes and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station, Unit Number 1, in accordance with these changes would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because no accident initiators, conditions or assumptions are affected by the proposed changes to Section 6.0, Administrative Controls, of the Technical Specifications (TS).

The proposed changes to relocate the detailed listings of TS Section 6.5.1, Station Review Board (SRB), and TS 6.5.2, Company Nuclear Review Board (CNRB), to the DBNPS Quality Assurance Program in Chapter 17 of the Updated Safety Analysis Report are consistent with the NRC's guidance in NUREG-1430, "Standard Technical Specifications - Babcock and Wilcox Plants," Revision 1 and NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995. These TS being relocated will remain subject to the controls of other NRC regulations (e.g., 10 CFR 50.54(a)). The proposed changes to the TS Index reflect the relocation of TS 6.5.1 and TS 6.5.2. These are administrative changes that do not reduce the duties or responsibilities of the SRB and CNRB in ensuring the safe operation of the DBNPS.

- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because no accident conditions or assumptions are affected by the proposed changes. As described above, these changes are consistent with the improved "Standard Technical Specifications - Babcock and Wilcox Plants" (NUREG-1430 Revision 1) and Administrative Letter 95-06, and are administrative changes. The proposed changes do not alter the source term, containment isolation, or allowable releases. The proposed changes, therefore, will not increase the radiological consequences of a previously evaluated accident.
2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident initiators or assumptions are introduced by the proposed changes, which involve the administrative location for listing SRB and CNRB responsibilities. The proposed changes do not alter any accident scenarios.
3. Not involve a significant reduction in a margin of safety because the proposed changes are administrative and do not reduce or adversely affect the capabilities of any plant structures, systems or components to perform their nuclear safety functions.

CONCLUSION:

On the basis of the above, the Davis-Besse Nuclear Power Station has determined that this License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that

must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed mark-up changes to the Operating License.

REFERENCES:

1. NUREG-1430, Revision 1, "Standard Technical Specifications - Babcock and Wilcox Plants," dated April, 1995.
2. NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (58 FR 39132, dated July 22, 1993).
3. 10 CFR 50.36, "Technical Specifications."
4. 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."
5. 10 CFR 50.54, "Conditions of Licenses."
6. 10 CFR 73.46, "Fixed Site Physical Protection Systems, Subsystems, Components, and Procedures."
7. DBNPS Updated Safety Analysis Report (USAR), through Revision 21, November, 1998.
8. DBNPS Operating License, Appendix A, Technical Specifications, through Amendment 233.
9. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."
10. NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (DBNPS Letter Log Number 4661).
11. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," November, 1972.

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	
Offsite and Onsite Organizations	6-1
Facility Staff	6-1a
Facility Staff Overtime	6-4a
<u>6.3 FACILITY STAFF QUALIFICATIONS</u>	6-5
<u>6.4 TRAINING</u>	6-5
<u>6.5 REVIEW AND AUDIT</u>	
<u>6.5.1 STATION REVIEW BOARD Deleted</u>	<u>6-5</u>
Function	6-5
Composition	6-6
Alternates	6-6
Meeting Frequency	6-6
Quorum	6-6
Responsibilities	6-6
Authority	6-8
Records	6-8
<u>6.5.2 COMPANY NUCLEAR REVIEW BOARD Deleted</u>	<u>6-5</u>
Function	6-8
Composition	6-9
Alternates	6-9
Consultants	6-9

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
Meeting Frequency	6-9
Quorum	6-9
Review	6-10
Audits	6-11
Authority	6-12
Records	6-12
6.5.3 Technical Review and Control	6-12
<u>6.6 REPORTABLE EVENT ACTION</u>	6-12a
<u>6.7 SAFETY LIMIT VIOLATION OR PROTECTIVE LIMIT VIOLATION</u>	6-13
<u>6.8 PROCEDURES AND PROGRAMS</u>	6-13
<u>6.9 REPORTING REQUIREMENTS</u>	
6.9.1 Routine Reports.....	6-14c
6.9.2 Special Reports.....	6-18
<u>6.10 RECORD RETENTION</u>	6-18
<u>6.11 DELETED</u>	
<u>6.12 HIGH RADIATION AREA</u>	6-20
<u>6.13 ENVIRONMENTAL QUALIFICATION</u>	6-21
<u>6.14 PROCESS CONTROL PROGRAM (PCP)</u>	6-22
<u>6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)</u>	6-22

ADDITIONAL CHANGES PREVIOUSLY
PROPOSED BY LETTER
Serial No. 2607 Date 01/27/99

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Manager - Radiological Control who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the Manager - Plant Operations whose requirement for a senior reactor operator license is as stated in Specification 6.2.2.g.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Manager - Nuclear Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and of 10 CFR 55.59.

6.4.2 Deleted

6.5 REVIEW AND AUDIT

6.5.1 STATION REVIEW BOARD (SRB) Deleted

FUNCTION

~~6.5.1.1 The Station Review Board (SRB) shall function to advise the Plant Manager on all matters related to nuclear safety.~~

Pages 6-6 through 6-11 have been deleted. The next page is 6-12.

ADMINISTRATIVE CONTROLS

COMPOSITION

~~6.5.1.2 The Station Review Board (SRB) shall be composed of at least six members of the Davis Besse onsite management organization. The members shall be as a minimum, managers or individuals reporting directly to managers from each of the following disciplines: plant operations, maintenance, planning, radiological controls, engineering, and quality assurance. The members shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.4, or 4.6 for applicable required experience.~~

~~The SRB Chairman shall be drawn from the SRB members and designated in writing by the Plant Manager.~~

ALTERNATES

~~6.5.1.3 All alternate members shall be appointed in writing by the SRB Chairman; however, no more than two alternates shall participate as voting members in SRB activities at any one time.~~

MEETING FREQUENCY

~~6.5.1.4 The SRB shall meet at least once per calendar month and as convened by the SRB Chairman or his designee.~~

QUORUM

~~6.5.1.5 A quorum of the SRB shall consist of the Chairman or his designee and four members including alternates.~~

RESPONSIBILITIES

~~6.5.1.6 The Station Review Board shall be responsible for:~~

- ~~a. — Review of plant administrative procedures and changes thereto.~~
- ~~b. — Review of the safety evaluation for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions do not constitute an unreviewed safety question.~~
- ~~c. — Review of proposed procedures and changes to procedures and equipment determined to involve an unreviewed safety question as defined in 10 CFR 50.59.~~

ADMINISTRATIVE CONTROLS

- d. ~~Review of proposed tests or experiments determined to involve an unreviewed safety question as defined in 10 CFR 50.59.~~
- e. ~~Review of reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.~~
- f. ~~Review of all proposed changes to the Technical Specifications or the Operating License.~~
- g. ~~Deleted~~
- h. ~~Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect plant safety.~~
- i. ~~Review of changes to the Industrial Security Plan, the Security Training and Qualification Plan, and the Security Contingency Plan.~~
- j. ~~Review changes to the Davis-Besse Emergency Plan.~~
- k. ~~Review of items which may constitute potential nuclear safety hazards as identified during review of facility operations.~~
- l. ~~Investigations or analyses of special subjects as requested by the Company Nuclear Review Board.~~
- m. ~~Review of all REPORTABLE EVENTS.~~
- n. ~~Review of all Safety Limit Violation Reports and Protective Limit Violation Reports (Section 6.7).~~
- o. ~~Review of any unplanned, accidental or uncontrolled radioactive releases, evaluation of the event, assurance that remedial action is identified to prevent recurrence, review of a report covering the evaluation and forwarding of the report to the Plant Manager and to the CNRB.~~
- p. ~~Review of the changes to the OFFSITE DOSE CALCULATION MANUAL.~~
- q. ~~Review of the changes to the PROCESS CONTROL PROGRAM.~~
- r. ~~Review of the Annual Radiological Environmental Operating Report.~~
- s. ~~Review of the Radioactive Effluent Release Report.~~
- t. ~~Review of changes to the Fire Protection Program.~~

ADMINISTRATIVE CONTROLS
AUTHORITY

6.5.1.7 The Station Review Board shall:

- a. Recommend to the Plant Manager written approval or disapproval of items considered under Sections 6.5.1.6 a, c, d, f, i and j.
- b. Render determinations in writing with regard to whether or not each item considered under Sections 6.5.1.6 a, c, d and f above constitutes an unreviewed safety question as defined in 10 CFR 50.59.
- c. Provide written notification within 24 hours to the Vice President, Nuclear and the Company Nuclear Review Board of disagreement between the SRB and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.
- d. Make recommendations in writing to the Plant Manager that actions reviewed under Section 6.5.1.6 b above do not constitute an unreviewed safety question.

RECORDS

6.5.1.8 The Station Review Board shall maintain written minutes of each meeting and copies shall be provided to the Plant Manager, Vice President, Nuclear and Chairman of the Company Nuclear Review Board.

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB) Deleted

FUNCTION

6.5.2.1 The Company Nuclear Review Board (CNRB) shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations;
- b. Nuclear engineering;
- c. Chemistry and radiochemistry;
- d. Metallurgy;
- e. Instrumentation and control;
- f. Radiological safety;
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

ADMINISTRATIVE CONTROLS

COMPOSITION

~~6.5.2.2 CNRB shall consist of a Chairman and four or more other members appointed by the Vice President, Nuclear. No more than a minority of the members of the CNRB shall have line responsibility for the operation of the facility.~~

~~The CNRB members shall hold a Bachelor's degree in an engineering or physical science or equivalent experience and a minimum of five years of technical experience of which a minimum of three years shall be in one or more of the disciplines of 6.5.2.1.a through 6.5.2.1.h. In the aggregate, the membership of the committee shall provide specific practical experience in the majority of the disciplines of 6.5.2.1.a through 6.5.2.1.h.~~

ALTERNATES

~~6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.~~

CONSULTANTS

~~6.5.2.4 Consultants shall be utilized as determined by the CNRB Chairman to provide expert advice to the CNRB.~~

MEETING FREQUENCY

~~6.5.2.5 The CNRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.~~

QUORUM

~~6.5.2.6 A quorum of CNRB shall consist of the Chairman or his designated alternate and at least half of the appointed CNRB members or their alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.~~

ADMINISTRATIVE CONTROLS

REVIEW

~~6.5.2.7 The Company Nuclear Review Board shall review:~~

- ~~a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.~~
- ~~b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.~~
- ~~c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.~~
- ~~d. Proposed changes in Technical Specifications or this Operating License.~~
- ~~e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.~~
- ~~f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.~~
- ~~g. ALL REPORTABLE EVENTS.~~
- ~~h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.~~
- ~~i. Reports and meetings minutes of the Station Review Board.~~

~~ADMINISTRATIVE CONTROLS~~AUDITS

~~6.5.2.8 Audits of facility activities shall be performed under the cognizance of the CNRB. These audits shall encompass:~~

- ~~a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.~~
- ~~b. The performance, training and qualifications of the entire station staff at least once per 12 months.~~
- ~~c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.~~
- ~~d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.~~
- ~~e. The Davis Besse Emergency Plan and implementing procedures at least once per 12 months.~~
- ~~f. The Industrial Security Plan and implementing procedures at least once per 12 months.~~
- ~~g. Any other area of facility operation considered appropriate by the CNRB.~~
- ~~h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.~~
- ~~i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.~~
- ~~j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.~~
- ~~k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.~~
- ~~l. The OFFSITE DOSE CALCULATION MANUAL and implementation of procedures at least once per 24 months.~~
- ~~m. The PROCESS CONTROL PROGRAM and implementation of procedures for processing and packaging of radioactive wastes at least once per 24 months.~~

ADMINISTRATIVE CONTROLS

AUTHORITY

~~6.5.2.9 The Company Nuclear Review Board shall report to and advise the Vice President, Nuclear, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.~~

RECORDS

~~6.5.2.10 Records of Company Nuclear Review Board activities shall be prepared, approved and distributed as indicated below:~~

- ~~a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the Vice President, Nuclear and CNRB members within 14 days following each meeting.~~
- ~~b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice President, Nuclear and CNRB members within 14 days following completion of the review.~~
- ~~c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear and CNRB members and to the management positions responsible for the areas audited within 30 days after completion of the audit.~~

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Plant procedures required by Section 6.8.1 and changes thereto shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by an individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Plant procedures other than plant administrative procedures will be approved as delineated in writing by individuals holding positions not lower than one management level below the Plant Manager. The Plant Manager will approve plant administrative procedures, Industrial Security Plan Implementing Procedures and Davis-Besse Emergency Plan Implementing Procedures.
- b. Temporary approval of changes to plant procedures cited in Section 6.8.1 which clearly do not change the intent of the approved procedures, can be made by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License. For changes to plant procedures, which may involve a change in intent of the approved

Docket Number 50-346
License Number NPF-3
Serial Number 2615
Attachment

COMMITMENT LIST

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THIS SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER - REGULATORY AFFAIRS (419-321-8466) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

COMMITMENT

DUE DATE

1. FENOC will relocate the TS 6.5.1, SRB and TS 6.5.2, CNRB to the Quality Assurance Program.

Implement changes within 120 days after NRC issuance of the LAR.