

Guy G. Campbell  
Vice President - Nuclear

419-321-8588  
Fax: 419-321-8337

Docket Number 50-346

License Number NPF-3

Serial Number 2619

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United States Nuclear Regulatory Commission  
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**Subject:** License Amendment Application to Revise Technical Specifications to create a Ventilation Filter Testing Program and Respond to NRC Generic Letter 99-02 (LAR 96-0013 Revision 1; TAC No. MA5731)

Ladies and Gentlemen:

Enclosed is a revised application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License NPF-3, Appendix A, Technical Specifications (TS). The original application was submitted to the NRC under DBNPS letter Serial Number 2500, dated June 10, 1999. Enclosed Revision 1 revises and supercedes the original application (LAR 96-0013) in its entirety. The proposed changes involve TS 3/4.6.4.4 - Hydrogen Purge System, TS 3/4.6.5.1 - Shield Building Emergency Ventilation System, TS 3/4.7.6.1 - Control Room Emergency Ventilation System and TS 6.0 - Administrative Controls. The proposed changes also involve the Bases to TS 3/4.6.4.4, TS 3/4.6.5.1 and TS 3/4.7.6.1.

This application proposes adoption of a Ventilation Filter Testing Program (VFTP) in TS Section 6.0 - Administrative Controls and removal of the specific ventilation filter testing requirements from the DBNPS Surveillance Requirements (SR) of TS 3/4.6.4.4, TS 3/4.6.5.1, and TS 3/4.7.6.1. The filter testing requirements of these TS will be replaced with a reference to the Ventilation Filter Testing Program requirements being added in TS Section 6.8.4.f - Ventilation Filter Testing Program. This line item TS improvement is based upon the NRC guidance of NUREG-1430 Revision 1, Standard Technical Specifications - Babcock and Wilcox Plants.

Additionally, in accordance with the recommendations of NRC Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," the current test

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standard ASTM D 3803-1979, "Standard Test Methods for Radioiodine Testing of Nuclear-Grade Gas Phase Adsorbents," is proposed to be replaced with ASTM D 3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon." Also the methyl iodide penetration requirements of the charcoal filter systems are proposed to be revised to increase the allowed penetration from <1% to  $\leq 2.5\%$ .

Requested Action Number 1 of GL 99-02 requests that each licensee submit a written response to the NRC describing the current TS requirements for the laboratory testing of charcoal samples for each ESF ventilation system. The information requested is provided in Table 1 of the attached License Amendment application.

The currently installed charcoal filters are scheduled for re-testing after June 6, 2000. Future testing will be performed in accordance with the requirements of ASTM D 3803-1989.

This revised license amendment satisfies the requirement of GL 99-02 to submit a license amendment application to adopt the requirements of ASTM D 3803-1989 prior to November 30, 1999.

The FirstEnergy Nuclear Operating Company requests that the NRC issue this amendment by June 5, 2000.

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

Very truly yours,



FWK/laj

Enclosure

cc: S. N. Bailey, DB-1 NRC/NRR Project Manager  
J. E. Dyer, Regional Administrator, NRC Region III  
J. R. Williams, Executive Director, Ohio Emergency Management  
Agency, State of Ohio (NRC Liaison)  
K. S. Zellers, DB-1 NRC Senior Resident Inspector  
Utility Radiological Safety Board