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Docket Number 50-346

License Number NPF-3

Serial Number 2629

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United States Nuclear Regulatory Commission  
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Subject: Supplemental Information for License Amendment Application to Revise  
Technical Specifications for Implementation of 10 CFR 50, Appendix J,  
Option B for Type B and C Containment Leakage Rate Testing  
(License Amendment Request No. 96-0012; TAC No. MA6093)

Ladies and Gentlemen:

On July 26, 1999, FirstEnergy (FE) submitted an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License Number NPF-3, Appendix A Technical Specifications, regarding implementation of 10 CFR 50, Appendix J, Option B for Type B and C Containment Leakage Rate Testing. This letter provides supplemental information relative to the July 26, 1999 submittal (DBNPS Serial Number 2572).

Included in the license amendment application was the proposed addition of a new Administrative Controls Section, Technical Specification (TS) 6.16, Containment Leakage Rate Testing Program. Proposed Technical Specification 6.16.a.3 included the following exception to Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995:

Following air lock door seal replacement, a door seal leakage rate test to demonstrate that the seal leakage rate is  $\leq 0.01 L_a$  with the volume between the door seals pressurized to  $\geq 10$  psig is an acceptable alternative to a door seal leakage test at  $P_a$  or an overall air lock leakage test at  $P_a$ .

Regulatory Guide 1.163 endorses Nuclear Energy Institute (NEI) 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." Under the guidance of NEI 94-01 Section 10.2.2.2, either an overall air lock test at  $P_a$ , or a leak rate test of the affected component, at  $P_a$ , is required following

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maintenance on an air lock pressure retaining boundary ( $P_a$  for the DBNPS is 38 psig). For the case of maintenance involving replacement of a door seal, the above-mentioned proposed exception would allow the additional option to that in NEI 94-01 Section 10.2.2.2 of performing a reduced pressure test on the replaced seal. Reduced pressure testing is currently acceptable in DBNPS TS 4.6.1.3.a for routine air lock door seal leakage rate testing.

However, based on recent discussions with the NRC staff, although the NRC had previously accepted on other dockets, the use of reduced pressure door seal testing following replacement of a door seal, this practice is no longer acceptable. Accordingly, the DBNPS requests that the proposed TS 6.16.a.3 exception be withdrawn. Following NRC approval and implementation of the proposed license amendment, future air lock door seal replacements will follow the requirements of NEI 94-01 Section 10.2.2.2, and either an air lock door seal test at  $\geq P_a$  or an overall air lock test at  $\geq P_a$  will be conducted. The leakage rate acceptance criteria for this test will be as specified in the proposed TS 6.16.d.3. The withdrawal of the proposed exception does not affect the previous determination of the license amendment application that the proposed changes do not constitute a significant hazards consideration.

As requested in the aforementioned license amendment application, the DBNPS requests that the amendment be approved by February 1, 2000, in order to have the proposed changes in effect during the Twelfth Refueling Outage, which is presently scheduled to commence in April 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,



MKL/laj

Enclosure

cc: S. N. Bailey, 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, NRC Region III, DB-1 Senior Resident Inspector  
Utility Radiological Safety Board

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### **COMMITMENT LIST**

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY 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 ANY ASSOCIATED REGULATORY COMMITMENTS.

#### **COMMITMENTS**

1. Future air lock door seal replacements will follow the requirements of NEI 94-01 Section 10.2.2.2, and either an air lock door seal test at  $\geq P_a$  or an overall air lock test at  $\geq P_a$  will be conducted. The leakage rate acceptance criteria for this test will be as specified in the proposed TS 6.16.d.3.

#### **DUE DATE**

1. Prior to implementation of the amendment (following NRC approval and issuance of the amendment).