



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, ILLINOIS 60532-4352

April 13, 2018

EA-18-008

Mr. Mark Bezilla
Site Vice President
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION - FINAL SIGNIFICANCE
DETERMINATION OF A WHITE FINDING WITH ASSESSMENT FOLLOW-UP
AND NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000346/2018090

Dear Mr. Bezilla:

This letter provides you the final significance determination of the preliminary White finding discussed in U.S. Nuclear Regulatory Commission (NRC) Inspection Report 05000346/2018010, dated March 9, 2018. A copy of the inspection report can be found in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html> under accession number ML18068A523. The finding involved the failure to provide appropriate instructions to maintain an adequate amount of oil in auxiliary feedwater turbine bearing oil sumps as required by Title 10 of the *Code of Federal Regulations* (CFR) Part 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings." The auxiliary feedwater pump is a component subject to the requirements of 10 CFR Part 50, Appendix B. The failure to provide instructions to properly calibrate sight glasses resulted in a low oil level in the auxiliary feedwater pump 1 turbine inboard bearing reservoir causing the failure of the auxiliary feedwater pump on September 13, 2017. The pump was inoperable from June 21, 2017, when oil was last removed from the bearing reservoir after the last quarterly surveillance, until September 15, 2017, when the bearing was replaced and the system successfully returned to service. The low oil level resulted in the auxiliary feedwater pump being unable to perform its intended safety function and becoming inoperable for a time longer than its technical specification allowed outage time.

In a letter dated March 16, 2018, you indicated that the Davis-Besse Nuclear Power Station would not request a regulatory conference and would not submit a written response. According to NRC Inspection Manual Chapter 0609, appeal rights only apply to those licensees that have either attended a regulatory conference or submitted a written response to the preliminary determination letter.

After considering the information developed during the inspection, the NRC has concluded that the finding is appropriately characterized as White, a finding of low to moderate safety significance.

The NRC has also determined that the failure to provide appropriate instructions on how to calibrate the turbine bearing oil sight glasses is a violation of 10 CFR Part 50, Appendix B,

Criterion V and technical specifications as cited in the enclosed Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in Inspection Report 05000346/2018010. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding.

The NRC has concluded that the information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report 05000346/2017004 (ML18045A076). Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position.

As a result of our review of Davis-Besse Nuclear Power Station's performance, including this White finding, we have assessed the Davis-Besse Nuclear Power Station to be in the Regulatory Response column of the NRC's Action Matrix, effective the fourth quarter of 2017. Therefore, we plan to conduct a supplemental inspection using Inspection Procedure 95001, "Supplemental Inspection Response To Action Matrix Column 2 Inputs," when your staff has notified us of your readiness for this inspection. This inspection procedure is conducted to provide assurance that the root cause and contributing cause of risk significant performance issues are understood, the extent of condition and the extent of cause are identified, and the corrective actions are sufficient to prevent recurrence.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

K. Steven West
Regional Administrator

Docket No. 050-00346
License No. NPF-3

Enclosure:
Notice of Violation

cc: Distribution via LISTSERV®

Letter to Mark Bezilla from K. Steven West dated April 13, 2018

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION - FINAL SIGNIFICANCE
 DETERMINATION OF A WHITE FINDING WITH ASSESSMENT FOLLOW-UP
 AND NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000346/2018090

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1 OE Concurrence received by email from Gerald Gulla dated April 9, 2018.

NOTICE OF VIOLATION

FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station

Docket No. 050-00346
License No. NPF-3
EA-18-008

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted January 1 through January 31, 2018, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the *Code of Federal Regulations* (CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Technical Specification (TS) 3.7.5, Emergency Feedwater (EFW), limiting condition for operation states, in part, that three EFW trains shall be operable, consisting of: two auxiliary feedwater (AFW) trains; and the motor driven feedwater pump (MDFP) train. Condition B.1 states that the required EFW train, if inoperable for reasons other than Condition A in Mode 1, 2, or 3, be restored to operable status within 72 hours. Required Action D.1 states the reactor be in Mode 3 within 6 hours, and Required Action D.2 states the reactor be in Mode 4 within 12 hours.

Contrary to the above, since the last known replacement of the sight glass in 1997, the licensee failed to prescribe instructions appropriate to the circumstances for an activity affecting quality of the safety-related auxiliary feedwater system. Specifically, the licensee failed to provide appropriate instructions on how to calibrate the turbine bearing oil sight glasses for the AFW trains. The failure to properly calibrate sight glasses resulted in a low oil level in the auxiliary feedwater pump 1 turbine inboard bearing reservoir causing the AFW pump to be inoperable from June 21, 2017, until the bearing was replaced and the system successfully returned to service on September 15, 2017, a period greater than TS 3.7.5.B.1 allowed outage time of 72 hours. The AFW train was inoperable due to reasons not listed in TS 3.7.5.A. Additionally, because the licensee was not aware of the auxiliary feedwater train's inoperability during the unit's operating cycle, the required actions of TS 3.7.D.1 and 3.7.5.D.2 were not followed.

This violation is associated with a White SDP finding.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report No. 05000346/2017004 (ML18045A076). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, EA-18-008," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region III, 2443 Warrenton Road,

Enclosure

Lisle, IL 60532, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.]

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 13th day of April 2018