

February 27, 2002

MEMO TO: File

FROM: Douglas V. Pickett, Sr. Project Manager, Section II **/RA/**  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION - LICENSEE ACCEPTANCE OF  
LICENSE CONDITION FOR STEAM GENERATOR REROLL REPAIRS  
(TAC NO. MB2107)

During the staff review of TAC No. MB2107 for the Davis-Besse Nuclear Power Station, the staff concluded that a License Condition was necessary to document the steam generator tube circumferential crack inspection and reporting requirements. Due to the need to issue the license amendment to support the steam generator tube reroll repairs during the current outage, the Office of General Counsel has accepted the attached electronic transmission from the licensee as documentation of their acceptance of the proposed License Condition.

The purpose of this Note is to place the attached electronic transmission in the Public Document Room under the Davis-Besse Docket File. The electronic transmission was referenced in both the license amendment dated February 20, 2002, and the associated *Federal Register* Notice. The individual referenced in the electronic transmission, Howard Bergendahl, is Vice President - Nuclear at the Davis-Besse site.

Docket No. 50-346

Attachment: Electronic transmission

cc: A. Mendiola

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**ADAMS Accession Number: ML020570063**

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DATE	2/27/02	2/27/02	2/27/02

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**From:** <mriemer@firstenergycorp.com>  
**To:** "Douglas Pickett" <DVP1@nrc.gov>  
**Date:** 2/19/02 3:22PM  
**Subject:** Re: Revised License Conditions

Doug,

The attached NRC-proposed license conditions have been reviewed by Howard Bergendahl, and FENOC consents to the proposed conditions as they embody the commitments made in DBNPS Serial Letter 2737, dated November 15, 2001. With FENOC's consent to these conditions, we expect the NRC to issue this amendment expeditiously. Please contact me if you have any questions.

Mark

(See attached file: Revised Reroll LC Rev 2.wpd)

**CC:** <drwuokko@firstenergycorp.com>, <dleshelman@firstenergycorp.com>, <dhlockwood@firstenergycorp.com>, <dmlmiller@firstenergycorp.com>, <dwgerren@firstenergycorp.com>, <jwrogers@firstenergycorp.com>, <mkleisure@firstenergycorp.com>

## 2.C(7) Steam Generator Tube Circumferential Crack Report

Following each inservice inspection of steam generator tubes, the NRC shall be notified by FENOC of the following prior to returning the steam generators to service:

- a. Indication of circumferential cracking inboard of the roll repair.
- b. Indication of circumferential cracking in the original roll or heat affected zone adjacent to the tube-to-tubesheet seal weld if no re-roll is present.
- c. Determination of the best-estimate total leakage that would result from an analysis of the limiting LBLOCA based on circumferential cracking in the original tube-to-tubesheet rolls, tube-to-tubesheet re-roll repairs, and heat affected zones of seal welds as found during each inspection.

FENOC shall demonstrate by evaluation that the primary-to-secondary leakage following a LBLOCA, if any, as described in Appendix A to Topical Report BAW-2374, July 2000, continues to be acceptable, based on the as-found condition of the steam generators. For the purpose of this evaluation, acceptable means that a best estimate of the leakage expected in the event of a LBLOCA would not result in a significant increase of radionuclide release (e.g., in excess of 10 CFR Part 100 limits). This is required to demonstrate that adequate margin and defense-in-depth continue to be maintained. A written summary of this evaluation shall be provided to the NRC within three months following completion of the steam generator tube inservice inspection.