FENOC
FirstEnergy Nuclear Operating Company

5501 North State Route 2
Oak Harbor, Ohio 43449

Mark B. Bezilla
Vice President - Nuclear

419-321-7676
Fax: 419-321-7582

Docket Number 50-346

License Number NPF-3

Serial Number 1-1328

September 15, 2003

Mr. James L. Caldwell, Administrator
United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Notification of Information Provided to the Nuclear Regulatory Commission that May Not Be Complete and Accurate in All Material Respects

Dr Mr. Caldwell:

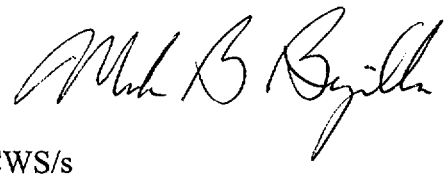
The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) that some information provided by the Davis-Besse Nuclear Power Station (DBNPS) in a prior submittal may not have been complete and accurate in all material respects as required by 10CFR50.9(a). It has been determined that none of the incomplete or inaccurate information has significant implication for public health and safety or common defense and security, and these conditions are not being reported under 10CFR50.9(b). This letter informs the NRC of this matter in accordance with station procedures only. Conditions associated with the incomplete or inaccurate information were reported by Licensee Event Report (LER) 2002-005-00, dated November 4, 2002, and supplements dated December 11, 2002 and May 21, 2003; and LER 2003-002-00, dated May 5, 2003.

The incomplete or inaccurate information was discovered during the process of preparing a revision to the DBNPS response to Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After A Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," dated July 14, 1998. Based on the information provided in the DBNPS response dated November 11, 1998, (DBNPS letter Serial Number 2571) the NRC concluded in a letter dated December 2, 1999, (DBNPS letter Log Number 5588) that all requested information had been provided and closed the licensing action for GL 98-04 for the DBNPS.

The response to GL 98-04 (DBNPS letter Serial Number 2571, dated November 11, 1998) will be added to the sample of regulatory submittals to determine the extent of condition to address the Davis-Besse 0350 Oversight Review Panel Restart Checklist Item 3.i, "Process for Ensuring Completeness and Accuracy of Required Records and Submittals to the NRC," to allow a more thorough review. Checklist Item 3.i was added by NRC letter to FirstEnergy Nuclear Operating Company (FENOC) dated January 28, 2003 (Reference DBNPS letter Log Number 1-4336).

If you have any questions or require further information, please contact Mr. Kevin L. Ostrowski, Manager – Regulatory Affairs, at (419) 321-8450.

Very truly yours,



CWS/s

Attachment – Commitment List
Enclosure – Summary of Information Provided to the NRC that May Not Be Complete and Accurate in All Material Respects

cc: USNRC Document Control Desk
DB-1 NRC/NRR Senior Project Manager
DB-1 Senior NRC Resident Inspector
Utility Radiological Safety Board

COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station, Unit Number 1, (DBNPS) in this document. Any other actions discussed in the 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 (419-321-8450) at the DBNPS of any questions regarding this document or associated regulatory commitments.

COMMITMENTS	DUE DATE
The response to GL 98-04 (DBNPS letter Serial Number 2571, dated November 11, 1998) will be added to the sample of regulatory submittals to determine the extent of condition to address the Davis-Besse 0350 Oversight Review Panel Restart Checklist Item 3.i, "Process for Ensuring Completeness and Accuracy of Required Records and Submittals to the NRC," to allow a more thorough review.	9/19/03

Summary of Information Provided to the NRC that May Not Be Complete and Accurate in All Material Respects

Submittal	Reference Letter	Page	Statement in Submittal	Summary of Incomplete/Inaccurate Information
GL 98-04 Response	Serial Number 2571 November 11, 1998	Letter Attachment, page 5	"The Service Level 1 protective coatings used inside containment at the DBNPS are qualified with the exceptions noted in response to Item 1." (The exceptions referred to in the statement include coatings within containment on surfaces to be insulated; surfaces contained within a cabinet or enclosure; repair/touch-up areas less than thirty square inches or surfaces such as cut ends, bolt heads, nuts and miscellaneous fasteners, damage from tack, spot or arc welding; small items such as small motors, handwheels, electrical cabinets, control panels, loud speakers, motor operators, etc. where special painting requirements would be impractical; stainless steel or galvanized surfaces; and banding that is used for insulating pipe.)	LER 2002-005-01, dated December 11, 2002, documented unqualified coatings applied to Systems, Structures and Components located within the Containment Building. The LER states that the majority of these unqualified coatings existed in the Containment Building prior to initial operation. Therefore, at the time the response to GL 98-04 was submitted to the NRC, unqualified coatings did in fact exist in the Containment Building applied to surfaces other than the exceptions listed in Serial 2571.
GL 98-04 Response	Serial Number 2571 November 11, 1998	Letter Attachment, page 7	"Any paint debris fragments that are small enough to pass through the 1/4-inch emergency sump intake screen openings would not clog spray nozzles or damage pumps."	LER 2003-002, dated May 5, 2003, documented a condition in which, following replacement of the original sump screens with 1/4-inch square openings with new screens with smaller of 3/6-inch round openings, that debris that could pass through the openings could damage the High Pressure Injection pumps.

Submittal	Reference Letter	Page	Statement in Submittal	Summary of Incomplete/Inaccurate Information
GL 98-04 Response	Serial Number 2571 November 11, 1998	Letter Attachment, page 7	"As stated previously, coatings used in containment are qualified, with the exceptions noted above for small equipment such as motors, handwheels, electrical cabinets, loud speakers, etc. If some of the unqualified material became loose, a portion might reach the emergency sump elevation. However, because of the small components and associated surface areas involved, they would not produce large sheets of debris that would block a significant amount of the intake screen surface area. In addition, coating material that becomes loose would have to make its way to the intake screen via potentially tortuous paths, transported by very low flow rates in most areas. In these low flow rates, paint flakes are expected to settle out and not be transported to the emergency sump intake screen. Therefore, based on reasonable engineering judgment, due to the relatively small amount of unqualified coatings in containment and the flow paths and flow velocities that will be present, large amounts of paint are not likely to be carried to the emergency sump screen and clog over 50 percent of the screen area preventing long-term or containment atmosphere cooling by HPI, LPI, CS or the CACs."	LER 2002-005-01 documented unqualified coatings applied to Systems, Structures, and Components located within the Containment Building, as described above. In addition, LER 2002-005-01 documented the potential that the amount of debris that could be generated could result in covering over 50 % of the emergency sump screen. Thus, an adequate free-flow area would not be assured. Debris blockage during recirculation could create excessive head loss and prevent adequate flow for core cooling and containment spray or could lead to pump damage.