



FirstEnergy Nuclear Operating Company

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Docket Number 50-346  
License Number NPF-3  
Serial Number 1-1332

November 7, 2003

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

Subject: Request for Extension on the Response to the Preliminary Significance Determination  
for a Greater Than Green Finding on the High Pressure Injection Pump Design Issue

Dear Mr. Caldwell:

The FirstEnergy Nuclear Operating Company (FENOC) is in receipt of the Nuclear Regulatory Commission (NRC) Integrated Inspection Report 2003-021 – Preliminary Greater Than Green Finding for the Davis-Besse Nuclear Power Station (DBNPS) dated October 8, 2003, regarding the performance deficiency involving the high pressure injection (HPI) pumps for accident mitigation during the recirculation mode of emergency core cooling. FENOC understands that the NRC is requesting additional information to facilitate more refined risk analyses which would include: (1) failure probability of the HPI pumps when operating in the high pressure recirculation mode, including the impact of unqualified coatings in containment, the as-found degraded condition of peeling coatings, and transfer of those coatings and all other debris through containment and the sump to the HPI pumps during the high pressure recirculation mode of operation; and (2) the contribution to risk due to fires. The NRC's evaluation to establish the preliminary greater than green finding appears to be appropriately reasonable and conservative, however, FENOC would like to provide the NRC with additional information in order to facilitate more refined risk analyses.

On November 3, 2003, Sonia Burgess, NRC Region III – Senior Risk Analyst, was contacted to discuss the information on our preliminary risk evaluation. The discussion included the evaluation performed subsequent to the receipt of the NRC's request and our progress to date, a request for clarifications, and the overall approach that Davis-Besse is taking to support the NRC's request. Additionally, further discussions were held with your Senior Risk Analyst during their visit to the DBNPS site on November 5 and 6, 2003, which provided the details on our

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approach to the NRC's request. In order to provide validated information to credit utilization of more appropriate risk assumptions and refined analyses, an extension until December 5, 2003, is requested. This extension will allow FENOC the necessary time to complete additional information required including external events and contribution to risk due to fires.

FENOC will continue to work through the NRC Senior Risk Analyst to ensure timely communications of the required risk information.

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

Very truly yours,



AWB/s

Attachment

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

**COMMITMENT LIST**

The following list identifies those actions committed to by the 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 (419-321-8450) at Davis-Besse of any questions regarding this document or associated regulatory commitments.

<u>COMMITMENTS</u>	<u>DUE DATE</u>
Provide validated information to the NRC to credit utilization of more appropriate assumptions in order for the NRC to facilitate more refined risk analyses.	December 5, 2003
FENOC will continue to work through the NRC Senior Risk Analyst to ensure timely communications of the required risk information.	December 5, 2003