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Docket Number 50-346

10 CFR 50.90

License Number NPF-3

Serial Number 3183

September 15, 2005

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001Subject: Davis-Besse Nuclear Power Station
Supplemental Information Regarding License Amendment Application to
Support Mark B-HTP Fuel Design for Cycle 15
(License Amendment Request (LAR) 05-0002; TAC No. MC6888)

Ladies and Gentlemen:

By letter dated May 2, 2005 (Serial Number 3131), the FirstEnergy Nuclear Operating Company (FENOC) submitted an application for amendment of the Operating License, Appendix A, Technical Specifications (TS) for the Davis-Besse Nuclear Power Station (DBNPS). The proposed amendment would revise TS Section 2.1.1, "Safety Limits – Reactor Core," and TS Section 2.2.1, "Limiting Safety System Settings – Reactor Protection System Setpoints" to support use of the Framatome Mark B-HTP Fuel design for Cycle 15, which is scheduled to begin following refueling in March 2006.

On June 9, 2005, and June 15, 2005, FENOC received informal requests from the NRC staff for additional information regarding the license amendment application. Additional information regarding these requests has been submitted in a separate letter, dated August 28, 2005 (Serial Number 3166).

On July 19, 2005, The NRC staff provided clarification of the June 15, 2005 request, with respect to the as-left instrument setting. Based on this clarification, FENOC has decided to supplement the May 2, 2005 license amendment application. The proposed change would add a TS footnote regarding the as-left instrument setting, consistent with the NRC position described in the March 31, 2005 letter from James A. Lyons, NRC, to Mr. Alex Marion, Nuclear Energy Institute. The proposed footnote reads as follows:

The as-left instrument setting shall be returned to a setting within the tolerance band of the trip setpoint established to protect the safety limit.

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Docket Number 50-346
License Number NPF-3
Serial Number 3183
Page 2

Enclosed are proposed changes to TS Table 4.3-1, "Reactor Protection System Instrumentation Surveillance Requirements," applicable to Functional Unit 7, "RC Pressure-Temperature," implementing the new footnote.

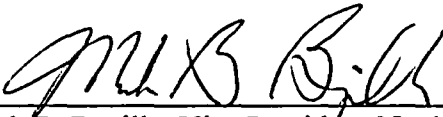
Other than the administrative description of the change itself, the previously submitted evaluation for LAR 05-0002 is unaffected, including the technical analysis, no significant hazards consideration, and environmental consideration.

Enclosure 1 contains revised TS markup pages incorporating this change. Enclosure 2 contains the retyped TS pages incorporating this change. A list of regulatory commitments made in this letter is included in Enclosure 3.

Should you have any questions or require additional information, please contact Mr. Henry L. Hegrat, Supervisor – Fleet Licensing, at (330) 315-6944.

The statements contained in this submittal, including its associated enclosures and attachments are true and correct to the best of my knowledge and belief. I am authorized by the FirstEnergy Nuclear Operating Company to make this submittal. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 15, 2005

By: 
Mark B. Bezilla, Vice President-Nuclear

MSH

Enclosures

cc: J. L. Caldwell, Regional Administrator, NRC Region III
N. Dragani, Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
W. A. Macon, DB-1 NRC/NRR Project Manager
C. S. Thomas, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

Docket Number 50-346
License Number NPF-3
Serial Number 3183
Enclosure 1
Page 1 of 3

**REVISED PROPOSED MARKUP
OF
TECHNICAL SPECIFICATION PAGES 3/4 3-7 and 3/4 3-8
(TABLE 4.3-1)**

(two pages follow)

TABLE 4.3-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
1. Manual Reactor Trip	N.A.	N.A.	S/U(1)	N.A.
2. High Flux	S	D(2), and Q(6,9)	N.A.	1, 2
3. RC High Temperature	S	R	SA(9)	1, 2
4. Flux - Δ Flux - Flow	S(4)	M(3) and Q(6,7,9)	N.A.	1, 2
5. RC Low Pressure	S	R	SA(9)	1, 2
6. RC High Pressure	S	R	SA(9)	1, 2
7. RC Pressure-Temperature	S	R(10)	SA(9,10)	1, 2
8. High Flux/Number of Reactor Coolant Pumps On	S	Q(6,9)	N.A.	1, 2
9. Containment High Pressure	S	E	SA(9)	1, 2
10. Intermediate Range, Neutron Flux and Rate	S	E(6)	N.A.(5)	1, 2 and *
11. Source Range, Neutron Flux and Rate	S	E(6)	N.A.(5)	2, 3, 4 and 5
12. Control Rod Drive Trip Breakers	N.A.	N.A.	Q(8,9) and S/U(1)(8)	1, 2 and *
13. Reactor Trip Module Logic	N.A.	N.A.	Q(9)	1, 2 and *
14. Shutdown Bypass High Pressure	S	R	SA(9)	2**, 3**, 4**, 5**
15. SCR Relays	N.A.	N.A.	R	1, 2 and *

TABLE 4.3-1 (Continued)

Notation

- (1) - If not performed in previous 7 days.
 - (2) - Heat balance only, above 15% of RATED THERMAL POWER.
 - (3) - When THERMAL POWER [TP] is above 50% of RATED THERMAL POWER [RTP], and at a steady state, compare out-of-core measured AXIAL POWER IMBALANCE [API_O] to incore measured AXIAL POWER IMBALANCE [API_I] as follows:

$$\frac{RTP}{TP} [API_O - API_I] = \text{Offset Error}$$

Recalibrate if the absolute value of the Offset Error is $\geq 2.5\%$
 - (4) - AXIAL POWER IMBALANCE and loop flow indications only.
 - (5) - CHANNEL FUNCTIONAL TEST is not applicable. Verify at least one decade overlap prior to each reactor startup if not verified in previous 7 days.
 - (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
 - (7) - Flow rate measurement sensors may be excluded from CHANNEL CALIBRATION. However, each flow measurement sensor shall be calibrated at least once each REFUELING INTERVAL.
 - (8) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of both the undervoltage and shunt trip devices of the Reactor Trip Breakers.
 - (9) - Performed on a STAGGERED TEST BASIS.
 - (10) - The as-left instrument setting shall be returned to a setting within the tolerance band of the trip setpoint established to protect the safety limit.
- * - With any control rod drive trip breaker closed.
 - ** - When Shutdown Bypass is actuated.

Docket Number 50-346
License Number NPF-3
Serial Number 3183
Enclosure 2
Page 1 of 3

**REVISED PROPOSED RETYPED
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(TABLE 4.3-1)**

(two pages follow)

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7. RC Pressure-Temperature	S	R(10)	SA(9,10)	1, 2
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14. Shutdown Bypass High Pressure	S	R	SA(9)	2**, 3**, 4**, 5**
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TABLE 4.3-1 (Continued)

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Docket Number 50-346
License Number NPF-3
Serial Number 3183
Enclosure 3
Page 1 of 1

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 Henry L. Hegrat, Supervisor – Licensing (330-315-6944) of any questions regarding this document or associated regulatory commitments.

<u>COMMITMENTS</u>	<u>DUE DATE</u>
None	Not applicable