

From: Purnell, Blake
Sent: Tuesday, January 21, 2020 1:13 PM
To: Lashley, Phil H.
Cc: talentz@firstenergycorp.com; Salgado, Nancy; Nesser, Kathryn M; Nevins, Kathleen J.
Subject: Davis-Besse Nuclear Power Station - Request for Additional Information Regarding License Amendment Request to Revise Containment Leakage Rate Testing (EPID L-2019-LLA-0186)
Attachments: DB ILRT RAI.pdf

Mr. Lashley:

By application dated August 26, 2019 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML19241A267), FirstEnergy Nuclear Operating Company submitted a license amendment request (LAR) for Davis-Besse Nuclear Power Station, Unit No. 1. The proposed amendment would revise Technical Specification 5.5.15, "Containment Leakage Rate Testing Program," by replacing the reference to Regulatory Guide 1.163, "Performance Based Containment Leak-Test Program" (ADAMS Accession No. ML003740058), with a reference to the Nuclear Energy Institute (NEI) topical report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" (ADAMS Accession No. ML12221A202), and the limitations and conditions specified in NEI 94-01, Revision 2-A (ADAMS Accession No. ML100620847). The proposed amendment would allow extension of the Type A test interval up to one test in 15 years, based on acceptable performance history as defined in NEI 94-01, Revision 3-A.

The U.S. Nuclear Regulatory Commission staff is reviewing the LAR and has determined that additional information is needed to complete the review. A response to the attached request for additional information is requested to be provided within 30 days from the date of this email. If you have any questions, please contact me at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Docket No. 50-346

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/BC
NAME	BPurnell	NSalgado
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Regarding License Amendment Request to Revise Containment Leakage Rate Testing (EPID
L-2019-LLA-0186)

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Options

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REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO
REVISE THE CONTAINMENT LEAKAGE RATE TESTING
FIRSTENERGY NUCLEAR OPERATING COMPANY
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1
DOCKET NO. 50-346

By application dated August 26, 2019 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML19241A267), FirstEnergy Nuclear Operating Company submitted a license amendment request (LAR) for Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse). The proposed amendment would revise Technical Specification (TS) 5.5.15, "Containment Leakage Rate Testing Program," by replacing the reference to Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program" (ADAMS Accession No. ML003740058), with a reference to the Nuclear Energy Institute (NEI) topical report NEI 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" (ADAMS Accession No. ML12221A202), and the limitations and conditions specified in NEI 94-01, Revision 2-A (ADAMS Accession No. ML100620847). The proposed amendment would allow extension of the Type A test interval up to one test in 15 years, based on acceptable performance history as defined in NEI 94-01, Revision 3-A.

The U.S. Nuclear Regulatory Commission staff is reviewing the LAR and has determined that the additional information below is required to complete the review.

Request for Additional Information (RAI) 1

The proposed changes to TS 5.5.15 in Attachment A of the LAR are not consistent with the revised wording of TS 5.5.15 proposed in Section 2.5 of the LAR. Clarify what changes to TS 5.5.15 are being requested.

RAI 2

Section 9.1 of NEI 94-01, Revision 3-A, states that the "[r]equired surveillance intervals for recommended Type A testing given in this section may be extended by up to 9 months to accommodate unforeseen emergent conditions, but should not be used for routine scheduling and planning purposes."

Section 2.4 of the LAR states that the proposed changes to TS 5.5.15 would permit Davis-Besse to "[a]dopt a more conservative allowable test interval extension of nine months, for Type A and Type B leakage rate tests in accordance with NEI 94-01, Revision 3-A. If the due date of the Type A test falls between scheduled outages, this test interval extension allows the test to be performed during the next scheduled outage." Explain how the proposed use of the test interval extension for this purpose is consistent with the limitations on test interval extensions specified in Section 9.1 of NEI 94-01, Revision 3-A.