

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NO. NPF-3
FOR
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NO. 1

Enclosed are forty-three (43) copies of the requested changes to the Davis-Besse Nuclear Power Station Unit No. 1 Facility Operating License No. NPF-3, together with the Safety Evaluation for the requested change.

The proposed changes include Sections 3.0.3, 4.0.3 and Bases.

By /s/ R. P. Crouse
Vice President, Nuclear

Sworn and subscribed before me this 1st day of July, 1983.

Laurie A. Hinkle, nee (Brudzinski)
Notary Public, State of Ohio
My Commission Expires May 16, 1986

S E A L

Docket No. 50-346
License No. NPF-3
Serial No. 961
July 1, 1983

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A
Technical Specifications 3.0.3, 4.0.3 and Bases.

A. Time required to Implement. This change is to be effective upon
NRC approval.

B. Reason for Change (Facility Change Request 82-158 Rev. C).

In response to discussions held on March 30, 1983 with the NRC concerning their philosophy on operability technical specifications, this change will allow greater operational stability and more orderly performed transients while ensuring the appropriate plant mode reflects the actual equipment and/or test condition.

C. Safety Evaluation
(see attached)

D. Significant Hazards Considerations

Toledo Edison has reviewed the above Amendment Request in accordance with 10 CFR 50.92(c) and has determined the proposed amendment would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. No accident or accident analysis is affected by this change. Only the time requirements to enter into a specific mode changing action statement are altered to permit a more orderly shutdown and to eliminate unnecessary transients.
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in D(1), no accident or accident analysis is affected. Actions to place the plant into the required condition are initiated within a one (1) hour time period when equipment operability has been determined to be the problem. A twelve (12) hour time is identified to determine if system or equipment inoperability resulting from administrative errors, will require specific actions.
- (3) involve a significant reduction in a margin of safety. Margins of safety are maintained through the allowance of sufficient time for orderly actions and the elimination of unnecessary actions.

SAFETY EVALUATION

This amendment request changes two Sections, 3.0.3 and 4.0.3, of the Davis-Besse (DB) Technical Specifications. The safety function of Section 3.0.3 is to provide for a shutdown of the unit, if required, due to equipment inoperability that places the plant both outside the limiting condition for operation and the applicable action statement.

The DB Technical Specifications currently require the unit to be placed in Hot Standby (Mode 3) within one hour of the time the plant goes outside the bounds of the action statement. If the plant is operating at high power levels, it cannot be shutdown in a controlled manner within one hour. Compliance with the one hour requirement, therefore, places a potential challenge to safety that the Technical Specification Limiting Conditions for Operation and the Action Statement are designed to prevent. The B&W STS (Rev. 4), however, allows six hours to reach Mode 3 with the provision that actions be initiated to place the unit in Mode 3 within one hour. Since the six hour time period allows a more orderly shutdown, the potential for challenge to Davis-Besse's safety systems, based on engineering judgement, is lowered, thereby increasing the margin of safety.

The safety function of Section 4.0.3 is to provide guidance in the determination of equipment/system operability in the event of missed surveillance tests. This amendment adds up to a 12 hour period to allow the missed test to be performed before entry into the shutdown statement is required. This period will help avoid an unnecessary transient on the plant, and therefore, a potential challenge to safety systems. Engineering judgement dictates that the relative risk due to potential inoperability of a missed surveillance test is lower than the risk due to a plant shutdown created transient before a surveillance can be performed to confirm the actual condition of the equipment.

The twelve (12) hour time period has been arrived at following a review of various surveillance test procedures along with the normal completion times to perform each of the tests. Examples of surveillance tests are included with completion times:

ST 5031.14	SFRCS Monthly Test	8 hours
ST 5031.19	ARTS Monthly Functional Test	8 hours
ST 5031.03	Containment Pressure to SFAS Calibration	8 hours

In addition to these completion times, a four hour time period was deemed necessary in order to allow for the appropriate off site personnel to be called and arrive on site, calibrate, test equipment, prepare test paperwork, set up test prerequisites and plant lineups, and obtain applicable approvals permitting test performance.

This amendment does not involve unreviewed safety questions.