



FirstEnergy Nuclear Operating Company

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February 3, 2020
L-20-041

10 CFR 50.90

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3
Response to Request for Additional Information Regarding License Amendment
Request to Extend Containment Leakage Test Interval (EPID L-2019-LLA-0186)

By letter dated August 26, 2019 (Accession No. ML19241A267), FirstEnergy Nuclear Operating Company (FENOC) requested an amendment to the facility operating license for the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS). The amendment would revise DBNPS 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," with a reference to Nuclear Energy Institute (NEI) topical report NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J," and the limitation and conditions specified in NEI 94-01, Revision 2-A with the same title, for Type A and B testing.

By email dated January 21, 2020, the NRC staff issued a request for additional information (RAI) to complete its review. The FENOC response to the RAI is attached. The information in the RAI responses supplements the license amendment request referred to above.

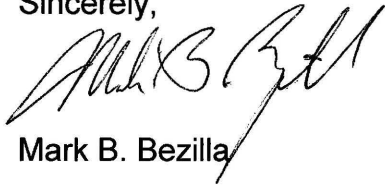
The information provided in this submittal does not invalidate the no significant hazards consideration analysis provided in the August 26, 2019 license amendment request.

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There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager Nuclear Licensing and Regulatory Affairs, at 330-315-6808.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 3, 2020.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark B. Bezilla', written over the printed name.

Mark B. Bezilla

Attachment:
Response to Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Branch Chief, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Response to Request for Additional Information
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By letter dated August 26, 2019, FirstEnergy Nuclear Operating Company (FENOC) requested an amendment to the facility operating license for the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS). The proposed change would revise DBNPS Technical Specification (TS) 5.5.15, "Containment Leakage Rate Testing Program."

In order to complete the review of the license amendment request (LAR), the NRC staff requested additional information. The requested information is presented below in bold typeface, followed by the FENOC responses.

Request for Additional Information 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.

Response:

The revised wording of TS 5.5.15 proposed in Section 2.5 of the LAR is hereby replaced by the following wording to be consistent with the proposed changes to TS 5.5.15 presented in Attachment A of the LAR.

The proposed change will revise Technical Specification 5.5.15.a to state:

A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in 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," dated July 2012, and the conditions and limitations specified in NEI 94-01, Revision 2-A, dated October 2008, as modified by the following exceptions:

1. A reduced duration Type A test may be performed using the criteria and Total Time method specified in Bechtel Topical Report BN-TOP-1, Revision 1.
2. The fuel transfer tube blind flanges (containment penetrations 23 and 24) will not be eligible for extended test frequencies. Their Type B test frequency will remain at 30 months. However, as-found testing will not be required.

Request for Additional Information 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.

Response:

The second bullet in Section 2.4 of the LAR is hereby replaced by the following wording to clarify that test interval extensions are to be used consistent with the limitations on test interval extensions specified in Sections 9.1 and 10.1 of NEI 94-01, Revision 3-A.

- Adopt an allowable test interval extension of up to nine months for Type A Leakage rate tests, and up to 25 percent of the test interval, not to exceed nine months, for Type B leakage rate tests in accordance with NEI 94-01, Revision 3-A. These extensions are permissible to accommodate unforeseen emergent conditions but should not be used for routine scheduling and planning purposes.