

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NUMBER NPF-3
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

Attached are requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1, Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes submitted under cover letter Serial Number concern:

Appendix A, Technical Specification 3.4.4.5, Reactor Coolant System - Steam Generators

Appendix A, Technical Specifications 1.32, 3.3.3.9, 3.11.1, 6.5.1.6, 6.9.1.11 and 6.15 (Semiannual Radioactive Effluent Release Report)

By:


D. C. Shelton, Vice President - Nuclear

Sworn and subscribed before me this 6th day of May, 1993.


Notary Public, State of Ohio

EVELYN L. DRESS
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires July 28, 1994

The following information is provided to support issuance of the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1, Operating License Number NPP-3, Appendix A Technical Specifications (TS) 3/4.4.5, Reactor Coolant System - Steam Generators and its associated Bases regarding reporting tube inspection category C-3 results, and TS 1.32, 3.3.3.9, 3.11.1, 6.5.1.6, 6.9.1.11 and 6.15 regarding the Semiannual Radioactive Effluent Release Report.

A. Time Required to Implement: This change is to be implemented within 90 days after the NRC issuance of the license amendment.

B. Reason for Change (License Amendment Request Number 92-0012):

The proposed changes would clarify the reporting requirements contained in TS 4.4.5.5c, TS Table 4.4-2, and associated Bases 3/4.4.5 regarding notification to the NRC of Steam Generator tube inspection Category C-3 results. This would also make the reporting requirements consistent with the New Standard Technical Specifications, NUREG-1430, Revision 0, TS 5.9.2. The proposed changes to TS 1.32, 3.3.3.9, 3.11.1, 6.5.1.6, 6.9.1.11 and 6.15 would revise the frequency requirement for the submission to the NRC of the Radioactive Effluent Report from semiannually to annually. This frequency revision is consistent with the recent revision to 10 CFR 50.36a, Technical Specifications on Effluents from Nuclear Power Reactors.

C. Safety Assessment and Significant Hazards Consideration: See Attachment 1.

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 92-0012

TITLE:

Revision of Technical Specification (TS) 6.9.1.11 and Other Related TSs to Change the Submittal Frequency of the Radioactive Effluent Release Report from Semiannual to Annual; and Revision of Reporting Requirements Referenced in TS 3/4.4.5, Steam Generators.

DESCRIPTION:

The purpose of this license amendment request is to propose modification of the Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A, Technical Specifications regarding:

1. Changing the frequency requirements in the TS 6.9.1.11 and related TSs from semiannually to annually for submission to the NRC of the Radioactive Effluent Release Report, and
2. Clarifying the reporting requirements contained in TS 4.4.5.5c, TS Table 4.4-2, and associated TS Bases 3/4.4.5 regarding notification to the NRC of steam generator tube inspection Category C-3 results.

An editorial correction is also proposed to TS 4.4.5.2a.3 to correct a minor error.

Federal Register, Volume 57, Number 169, dated August 31, 1992, entitled "Reducing the Regulatory Burden on Nuclear Licensees" announced the revision of the NRC's regulations in 10 CFR 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors", regarding the frequency requirements for submittal of Radiological Effluent Release Reports. This final rule, effective October 1, 1992, revised the regulations for the submission of reports concerning the quantity of principal nuclides released to unrestricted areas in liquid and gaseous effluents from a semiannual to an annual frequency.

In accordance with the new rule, this license amendment request proposes administrative changes to Technical Specifications 1.32 (Definitions - Offsite Dose Calculation Manual (ODCM)), 3.3.3.9 (Instrumentation - Waste Gas System Oxygen Monitor), 3.11.1 (Radioactive Effluents - Liquid Holdup Tanks), 6.5.1.6s (Responsibilities (Station Review Board)), 6.9.1.11 (Semiannual Effluent Release Report), and 6.15 (Offsite Dose Calculation Manual (ODCM)).

In addition, this license amendment request proposes administrative changes to Technical Specification 4.4.5.5c, Reports, and Table 4.4-2 (Steam Generator Tube Inspection), and associated TS Bases 3/4.4.5, Steam Generators, which currently require notification to the NRC pursuant to TS 6.9.1, Routine Reports, of steam generator tube inspection results which fall into Category C-3. Category C-3 results

can exist when more than ten percent of the total tubes inspected are degraded tubes or more than one percent of the inspected tubes are defective. "Degraded tubes" and "defect" are defined in TS 4.4.5.4.

The proposed changes to TS 4.4.5.5c, Table 4.4-2, and associated TS Bases 3/4.4.5, would clarify the required reporting requirements regarding notification to the Commission of the results of steam generator tube inspections which fall into Category C-3 prior to resumption of plant operation.

An additional administrative change is proposed to delete Note (2) of Table 4.4-2. Note (2) summarizes information already found in the table and, therefore, is not required.

An editorial correction is also proposed to TS 4.4.5.2a.3 to correctly reference the appropriate TS definition of tube inspection in TS 4.4.5.4a.9 (not TS 4.4.5.4a.8).

SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

These proposed changes affect activities associated with the reporting of Category C-3 steam generator tube inspection results to the NRC, and the frequency of submitting Radiological Effluent Release Reports to the NRC.

SAFETY FUNCTION OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The Radiological Effluent Release Report provides the NRC with a summary of the quantity of principal nuclides released to unrestricted areas in liquid and gaseous effluents, summarizes the quantities of radioactivity contained in solid waste packaged and shipped for offsite disposal, and estimates the maximum potential radiation doses to the public resulting from effluent releases.

The function of the reporting requirements for steam generator tube inspections results which fall into Category C-3 is to require notification to the NRC prior to the resumption of power operation. Such results will be considered by the NRC on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, or revision of the Technical Specifications, if necessary.

EFFECTS ON SAFETY:

The Semiannual Radioactive Effluent Release Report under TS 6.9.1.11 is currently submitted within 60 days after January 1 and July 1 of each year and covers the operation period for the previous six months. The proposed revision would delete the word "semiannual" and the words "during the previous six months of operation shall be submitted within 60 days after January and July 1 of each year." The proposed wording would require submittal of the Radioactive Effluent Release Report in accordance with revised 10CFR50.36a. This change is consistent with the intent of the Federal Register notice, entitled "Reducing the Regulatory Burden on Nuclear Licensee", Volume 57, Number 169, dated

August 31, 1992 which identified that the NRC resident inspector program along with regional regulatory programs provide timely review of plant operations and that the changes will not impair the NRC's ability to review the information (page 39355).

The proposed wording is consistent with the wording of the new Standard Technical Specifications for Babcock and Wilcox Type Nuclear Steam Supply Systems, NUREG-1430, Revision 0, dated September 28, 1992, TS 5.9.1.4, Radioactive Effluent Release Report. A particular date is no longer specified because it "... gives the licensee maximum flexibility for scheduling submission of radiological effluent reports with the only restriction that the interval between reports must not exceed 12 months" (Federal Register Volume 57, Number 169, August 31, 1992, page 39354).

The NRC concluded that this change in reporting from semiannually to annually does not reduce the protection for public health and safety.

The reporting of defective steam generator tubes which fall into Category C-3 under TS 4.4.5.5c and Table 4.4-2 is currently required by TS to be performed pursuant to TS 6.9.1. However, the reporting requirements which previously existed in TS 6.9.1 were deleted with License Amendment Number 93. License Amendment Number 93, in turn, was proposed and approved based on the NRC's recommendations in Generic Letter 83-43 (Reporting Requirements of 10CFR Part 50, Section 50.72 and 50.73, and Standard Technical Specifications) dated December 19, 1983. Toledo Edison's license amendment request and License Amendment Number 93 did not identify that a change to TS 4.4.5.5c and Table 4.4-2 was necessary. This oversight was later identified by Toledo Edison's self-initiated Technical Specification Verification Program. The proposed revision would require notification to the NRC of the results of steam generator tube inspections which fall into Category C-3, prior to resumption of plant operation.

The proposed changes to the reporting requirements of defective steam generator tubes which fall into Category C-3, and the submittal frequency of the Radiological Effluent Release Report are administrative changes, and will have no adverse effect on safety. The proposed deletion of Note (2) to TS Table 4.4-2 is an administrative change and will have no adverse effect on safety. The proposed changes to TS 4.4.5.2a.3 to reference the steam generator tube inspection definition is an editorial correction, and will have no adverse effect on safety.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated;

or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed changes and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station Unit Number 1, in accordance with these changes would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because no initiators or assumptions for a previously evaluated accident are affected by the proposed administrative reporting requirement changes to TS 4.4.5.5c, Table 4.4-2, 1.32, 3.3.3.9, 3.11.1, 6.5.1.6s, 6.9.1.11 and 6.15, and Bases 3/4.4.5, or by the proposed editorial correction to TS 4.4.5.2a.3.
- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because no equipment, accident conditions, or assumptions which could lead to an increase in radiological consequences are affected by these proposed administrative reporting requirement changes or editorial correction.
- 2a. Not create the possibility of a new kind of accident from any accident previously evaluated because no new accident initiators are being introduced, no new hardware changes are being made, no new testing is being instituted and no new operating manipulations are being created by these proposed administrative reporting requirement changes or editorial correction.
- 2b. Not create the possibility of a different kind of accident from any accident previously evaluated because no different accident initiators are being introduced, no changes in hardware are being made, no different testing is being instituted, and no different plant manipulations are being created by these proposed administrative reporting requirement changes or editorial correction.
3. Not involve a significant reduction in a margin of safety because the proposed changes do not reduce or adversely affect the capabilities of any plant structures, systems or components, and involve only administrative reporting requirements and an editorial correction.

CONCLUSION:

On the basis of the above, Toledo Edison has determined that the License Amendment Request does not involve a significant hazards consideration. As the License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed mark-up changes to the Operating License.