



Docket No. 50-346

License No. NPF-3

Serial No. 916

March 9, 1983

RICHARD P. CROUSE
Vice President
Nuclear
14191 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stolz:

This is in response to Mr. D. G. Eisenhut letter of February 22, 1983 (Log No. 1228) concerning Exemption Request - Vessel Head Vent. Toledo Edison was requested to provide additional information for consideration of an exemption extending the implementation deadline for 10CFR50.44(c)(3)(iii). The following is our response to the requested information for Davis-Besse Nuclear Power Station Unit 1.

REQUEST

1. A commitment to perform the necessary integral system testing which demonstrates the efficacy of your proposed method of noncondensable gas removal from the reactor vessel head.

RESPONSE

1. A integral system test to demonstrate the removal of noncondensable gases has been included in the test matrix which will be conducted in the B&W, Alliance test facility. Toledo Edison is committed to endorse this test program. The test program was formulated as an overall B&W Owner's Group effort in response to TMI action plan NUREG-0737, Item II.K.3.30.

REQUEST

2. A realistic schedule for the submittal of your evaluation of the test results which will verify analytical methods and operating procedures described herein.

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RESPONSE

2. Within 6 months after the integral system test is performed, Toledo Edison will submit a report providing evaluation of test results to verify analytical methods and operating procedures.

REQUEST

3. A commitment that, prior to startup from the next scheduled refueling, the hot leg vents will have been installed and declared operable, procedures will be in place and operators will have been trained for using the high point vents to vent noncondensable gas trapped in the reactor vessel.

RESPONSE

3. Toledo Edison has completed the installation of the hot leg vents in the 1982 refueling outage. Per NUREG-0737 Item II.B.1, Staff approval is required before the operating procedure can be implemented. The operating procedure for Davis-Besse Unit 1 on hot leg vents is included as part of the B&W Abnormal Transient Operating Guideline (ATOG) procedure which is currently under staff review. We will implement the operation procedure for the hot leg vent, including training of operators, within 6 months after the ATOG procedure is approved.

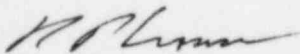
REQUEST

4. Your Safety Analysis regarding the interim use of the above procedures for a period of time needed to conduct and evaluate the necessary integral testing program results, but not less than four years.

RESPONSE

4. The operating procedure in ATOG for hot leg vent will be regarded as an interim procedure until results from integral system test are evaluated. By that time, (less than 4 years) the procedure shall be finalized.

Very truly yours,



RPC:FYC

cc: NRC DB-1 Resident Inspector

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