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Subject: Summary of October 25, 1990 Meeting Regarding Fire Hazards  
Analysis Report Revision 12

Gentlemen:

On October 25, 1990, Toledo Edison and Nuclear Regulatory Commission (NRC) Office of Nuclear Reactor Regulation (NRC/NRR) Staff personnel met in the NRC's White Flint offices in Rockville, Maryland. The purpose of this meeting was to discuss the submittal of the Davis-Besse Nuclear Power Station (DBNPS) Fire Hazards Analysis Report (FHAR) Revision 12 to the NRC and the impact of this submittal on the NRC's Fire Protection Safety Evaluation Report (SER) currently under preparation. This letter provides a summary of the meeting and conclusions.

Toledo Edison discussed in detail the differences between FHAR Revision 12 and the documents previously submitted to the NRC (the Fire Area Optimization Report (FAOR) Revision 1 and FHAR Revision 11). Toledo Edison noted that FAOR Revision 1 had superseded portions of FHAR Revision 11, and created some conflict between the two documents. FHAR Revision 12 integrated these two documents into a single document, eliminated the conflicts, and provided an improved description of the fire protection compliance program at the Davis-Besse Nuclear Power Station (DBNPS).

In this meeting, Toledo Edison noted that it planned to submit the FHAR Revision 12 at this time to allow the Fire Protection SER to reflect the current fire hazards analysis and program at the DBNPS. This would simplify Toledo Edison's submittal, and the NRC's review, of a future license amendment request to relocate the Fire Protection Technical Specifications to the Updated Safety Analysis Report in accordance with Generic Letters 86-10 and 88-12. Toledo Edison stated that FHAR Revision 12 did not invalidate the results of the April to May 1990 NRC Appendix R inspection as documented in NRC Inspection Report 90007 (DRS) dated August 22, 1990.

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(Toledo Edison letter Log Number 1-2345) and that FHAR Revision 12 did not alter the fire hazards analysis that was reviewed during that inspection. Toledo Edison characterized the changes as largely administrative and editorial, and provided numerous examples to support this statement. Toledo Edison agreed to include several of these examples in the cover letter to the NRC submitting FHAR Revision 12.

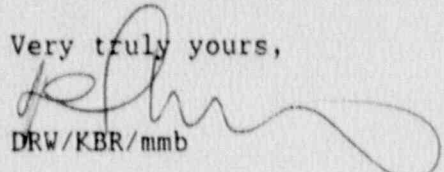
The NRC Staff questioned Toledo Edison regarding the technical nature of these differences between FHAR Revision 12 and both FAOR Revision 1 and FHAR Revision 11 and concluded that the differences were not substantive or technical in nature. The NRC Staff contacted NRC Region III by telephone and summarized the conclusions of the discussion for NRC Region III. NRC Region III concurred with NRC/NRR that the changes as presented by Toledo Edison were not substantive or technical in nature and that they did not invalidate the April and May 1990 Appendix R inspection. NRC Region III suggested that the NRC's Fire Protection contractor review the clarifying changes to the non-nuclear instrumentation power supplies, but since these power supplies were on drawings and in procedures during the Appendix R inspection, there should be no effect on the Inspection Report 90007 (DRS). Accordingly, the NRC staff stated that FHAR Revision 12 would be incorporated into the Fire Protection SER.

The NRC Staff stated that the SER is currently projected to be issued in late November 1990 and would reference FHAR Revision 12. However, it was noted that issuance of the SER was dependent on NRC management's priorities. Toledo Edison indicated that FHAR Revision 12 would be submitted with an explanation of the differences between FHAR Revision 12 and both FHAR Revision 11 and FAOR Revision 1 within approximately two weeks.

Toledo Edison informed the NRC staff that the FHAR would be revised to support the relocation of the Fire Protection Technical Specifications and to incorporate the Appendix R radio communications study. Any other major FHAR revisions would be performed under the provisions of the new license condition, assuming a Toledo Edison submittal in late 1990 and NRC approval in early 1991 of a Generic Letter 86-10 license amendment request. Toledo Edison also stated it was their intention to improve the Technical Specifications during the relocation process as these improvements will enhance the requirements of the previous Technical Specifications.

Should you have any questions or require additional information, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

  
DRW/KBR/mmb

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
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