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Docket Number 50-346

License Number NPF-3

Serial Number 1925

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United States Nuclear Regulatory Commission
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Subject: Additional Response to Generic Letter 90-04: Status of
Implementation of Generic Safety Issue (GSI) Number 99

Gentlemen:

The Nuclear Regulatory Commission (NRC) requested in Generic Letter 90-04 (Toledo Edison Log Number 3232), dated April 25, 1990, that Toledo Edison provide the status of the implementation of specific Generic Safety Issues (GSIs) at the Davis-Besse Nuclear Power Station (DBNPS), Unit 1. In response to Generic Letter 90-04, Toledo Edison completed the table of GSIs (supplied as Enclosure 1 to Generic Letter 90-04) to provide a summary status of each GSI requirement or corrective action. The completed table was submitted to the NRC as an enclosure to Toledo Edison letter Serial Number 1818, dated June 29, 1990.

With respect to GSI 99 (MPA L817), Toledo Edison provided the present status in Serial Number 1818 as follows:

<u>GSI/(MPA No.)</u>	<u>Title</u>	<u>Applicability</u>	<u>Status*</u>	<u>Comments</u>
99(L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	I	Outstanding work; review alarms and effectiveness for loss of decay heat removal and provide additional information, if necessary, by 12/91.

*"I" means change is necessary, but isn't complete.

Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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Following Toledo Edison's response (Serial Number 1818) to this Generic Letter, the NRC submitted a letter to Toledo Edison, dated December 7, 1990 (Toledo Edison Log Number 1-2406). The enclosure to this NRC letter summarized the NRC Staff's understanding of the current status of those GSIs which remain unimplemented at DBNPS.

With respect to GSI 99, the NRC's status (Log 1-2406) was as follows:

<u>GSI/(MPA No.)</u>	<u>Title</u>	<u>Projected Implementation</u> <u>Date</u>	<u>Comments</u>
99/L817	RCS/RHR Suction Line Valve Interlock on PWRs	12/91	Interlocks to be removed at the end of the current fuel cycle (cycle 7)

The information in the "comments" column has been changed significantly by the NRC Staff from that which Toledo Edison submitted in letter Serial Number 1818. Subsequently, Toledo Edison has discussed this change with the NRC Staff and has been unable to determine the basis for the NRC's information.

The NRC's technical resolution of GSI 99 was achieved with the issuance of Generic Letter 88-17 (Loss of Decay Heat Removal). Toledo Edison responded to Generic Letter Number 88-17 in Toledo Edison letters dated January 3, 1989 (Serial Number 1623) and February 1, 1989 (Serial Number 1631). Toledo Edison's GSI 99 status description to review alarms and their effectiveness in indicating an approach to the loss of decay heat removal by December, 1991 represents the latest Toledo Edison projected completion date for actions recommended by Generic Letter Number 88-17 and thereby bounds the overall completion of remaining work to be implemented for GSI 99. Furthermore, in response to Generic Letter Number 87-12 (Loss of Residual Heat Removal While the Reactor Coolant System (RCS) Is Partially Filled), Toledo Edison stated in letter Serial Number 1423, dated September 23, 1987, that the interlocks associated with the RCS boundary valves that provide the suction flowpath for Decay Heat Removal (DHR) operations (DH 11 and DH 12) were not a problem for DHR operations. Technical Specifications 3/4.4.1.2 and 3/4.4.2 and plant procedures require the removal of control power from DH 11 and DH 12, once they are opened, to prevent their inadvertent closure while the DHR system is in operation. Therefore, contrary to the NRC status for GSI 99 (Log Number 1-2406), Toledo Edison does not intend to remove the interlocks associated with DHR suction valves DH 11 and DH 12.

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Accordingly, Toledo Edison requests the difference between Toledo Edison's submittal (Serial Number 1818) and the NRC's letter (Log Number 1-2406, dated December 7, 1990) on the status of GSI 99 be resolved by utilizing the "comments" originally submitted by Toledo Edison letter Serial Number 1818.

If you have any questions, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



RAS/mmb

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
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Utility Radiological Safety Board