

Docket Number 50-346
License Number NPF-3
Serial Number 1840
Enclosure
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APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION

UNIT NO. 1

Attached are the 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 1840) concern:

Technical Specifications: 6.5.1.2, SRB Composition
6.5.1.4, Meeting Frequency
6.5.1.5, Quorum
6.3, Facility Staff Qualifications
6.4, Training

By: 

D. C. Shelton, Vice President,
Nuclear, Davis-Besse

Sworn and subscribed before me this 10 th day of May, 1991.


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 NPF-3, Appendix A, Technical Specifications, Section 6.0.

- A. Time Required to Implement: This change is to be implemented within 45 days after the NRC issuance of the License Amendment.
- B. Reason for Change (License Amendment Request Number 90-0010): This change affects TS 6.0 by revising the Station Review Board (SRB) composition. These composition changes are proposed in order to reduce the necessity of a License Amendment Request each time a specific position or department title which involves SRB members is changed. In addition, various other position titles are proposed for revision to reflect organizational position title changes.
- C. Safety Assessment and Significant Hazards Consideration: See Attachment 1.

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 90-0010

TITLE

Revision of Technical Specifications Section 6.0, Administrative Controls, regarding Station Review Board Composition and Organizational Title Changes.

DESCRIPTION

The purpose of the proposed changes is to modify the Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A Technical Specifications (TS) Section 6.0 (Administrative Controls). The proposed changes are administrative in nature and involve revising the organizational position titles within the composition of the Station Review Board (SRB). In addition, various position titles are proposed for revision to reflect organizational changes. The proposed changes are similar to the intent of the Nuclear Regulatory Commission's (NRC's) guidance of Generic Letter (CL) 88-06, dated March 22, 1988, Removal of Organization Charts from TS Administrative Control Requirements (Toledo Edison letter Log Number 2534).

The proposed change to TS 6.5.1.2, SRB Composition, will replace the specific titles of the SRB members with the following: "The Station Review Board shall be composed of at least six members of the Davis-Besse onsite management organization at the supervisor level or above. Each of the following disciplines shall be represented: plant operations, maintenance, planning, radiological controls, engineering, and quality assurance. The SRB Chairman shall be drawn from the SRB members and designated in writing by the Plant Manager."

These composition changes are proposed in order to reduce the necessity of a License Amendment Request (LAR) each time a specific position or department title which involves SRB members is changed. Six License Amendments have been requested and approved to date, in order to change the specific titles in this particular TS. This is an unnecessary administrative burden which could better be handled under the 10 CFR 50.59 process. The details of the specific position titles for members of the SRB will be located in administrative procedures. Changes to these procedures are made in accordance with 10 CFR 50.59.

This proposed change is similar to that approved by the NRC on October 10, 1989 as License Amendment Number 122 (TAC Number 74194) to the Crystal River Nuclear Generating Plant Operating License Number DPF-72, Appendix A Technical Specifications and approved by the NRC on November 14, 1990 as License Amendment Number 10 (TAC Number 75616) and 20 (TAC Number 75617) to South Texas Project Unit 1 and 2 Operating License Number NPF-80, Appendix A, Technical Specifications.

The additional proposed changes reflect organizational changes, are administrative in nature, and affect the following sections in TS 6.0 (Administrative Controls):

6.3 (page 6-5) - Change "Radiological Controls Superintendent" to "Manager - Radiological Control" in order to reflect the current position title.

6.4.1 (page 6-5) - Change "Nuclear Training Director" to "Manager - Nuclear Training" in order to reflect the current position title.

6.4.2 (page 6-5) - Change "Nuclear Training Director" to "Manager - Nuclear Training" in order to reflect the current position title.

6.5.1.4 (page 6-6) - Change "designated alternate" to "designee".

6.5.1.5 (page 6-6) - Change "designated alternate" to "designee".

SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED

These proposed changes affect specific position titles within Section 6.0 of the TS and the specific composition of the SRB.

SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES

The function of TS Section 6 is to provide the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the station in a safe manner. The function of the SRB is to advise the Plant Manager on matters related to nuclear safety.

EFFECTS ON SAFETY

The SRB is currently composed of eight members, one of whom is designated Chairman. The SRB meets as required, but not less than once each month, advising the Plant Manager on matters related to nuclear safety. Responsibilities of the SRB include review of plant administrative procedures and review of the safety evaluations for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provisions of 10 CFR 50.59 to verify such actions do not constitute an unreviewed safety question. The SRB also renders written determinations of whether certain items it has reviewed constitute an unreviewed safety question, and may recommend approval, disapproval, or other dispositions of review items.

The composition description for the SRB is proposed to be changed in TS 6.5.1.2 so that the specific position titles are not used to designate membership; rather, general requirements that capture the essential aspects of the SRB composition are added. This change is consistent with the intent of GL 88-06 which allows the removal of the position titles and reporting requirements in the onsite and offsite organization charts from the TSs to provide greater flexibility to implement changes in those organizations.

The proposed change requires that the SRB members and chairman be part of the DBNPS onsite management organization. This ensures that with the elimination of specific position titles, the SRB will continue to be comprised of personnel closely involved with daily activities at the station. The proposed change requires that the six SRB members and chairman be of a supervisor level or above representing the disciplines of plant operations, maintenance, planning, radiological controls, engineering, and quality assurance. This change ensures that the SRB will continue to be composed of experienced individuals with varied expertise, while instituting additional flexibility as to specific appointments to the board.

The reduction in SRB members from eight to six is as a result of eliminating duplicate representation from the plant operations discipline. There is no adverse effect on safety since operations will continue to be a member of the SRB.

The additional proposed changes to update position titles (e.g., changing "Radiological Controls Superintendent" to "Manager - Radiological Control") are administrative changes.

Accordingly, it is determined that the proposed changes are administrative in nature and do not have a detrimental effect on safety.

SIGNIFICANT HAZARDS CONSIDERATION

The NRC 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 DBNPS 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 these proposed changes to TS 6.0.
- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because no initiators or assumptions for a previously evaluated accident are affected by these proposed changes to TS 6.0.
- 2a. Not create the possibility of a new kind of accident previously evaluated because no accident initiators are created. No new hardware changes are being made, no new testing is being created and no new operating manipulations are being created by these proposed changes to TS 6.0.

- 2b. Not create the possibility of a different kind of accident from any accident previously evaluated because no accident initiators are created. No changes in hardware, testing, or plant manipulations are being created by these proposed changes to TS 6.0.
3. Not involve a significant reduction in a margin of safety because the Station Review Board will continue to be composed of experienced, onsite supervisory personnel with expertise in the disciplines of plant operations, maintenance, planning, radiological controls, engineering and quality assurance. The other proposed changes are strictly administrative in nature.

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 Specification 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 marked-up changes to the Operating License.