

Docket No. 50-346

License No. NPF-3

Serial No. 1005

December 2, 1983



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

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

Dear Mr. Stolz:

This letter is being submitted to request an exemption from 10 CFR 50.54 (m)(iii) "Conditions of Licenses" concerning "Licensed Operators Staffing at Nuclear Power Units" for Davis-Besse Nuclear Power Station Unit No. 1. Pursuant to 10 CFR 50.12(a), relief is requested from the requirement to have a person holding a senior operator license for the nuclear power unit in the control room at all times in an operational mode other than cold shutdown.

The Davis-Besse Station manning has two Senior Reactor Operator's (SROs) on shift at all times, the Shift Supervisor and Assistant Shift Supervisor. The Shift Supervisor (SS) works primarily in his office which is inside security door 509 and located approximately 30 feet from the nearest Control Room panel. A layout showing the Control Room Area configuration is included as Attachment 1 to this letter. Although both the Control Room Panel Area and the SS's office have doors, the close proximity of the SS's office allows him to reach the control room within seconds of a request for his presence.

The majority of the SS's time is spent coordinating maintenance and operational activities. One of the most important aids utilized by the SS is the Davis-Besse Maintenance Management System (DBMMS) which is a computerized activity tracking system. Since the system is used to support the generation of Maintenance Work Orders (MWOs), the tool utilized to control maintenance activities, and the SS must approve all MWOs prior to their implementation, a terminal allowing access to DBMMS is essential.

The Davis-Besse Control Room Panel Area, designed and built prior to TMI, is not large enough to accommodate the DBMMS terminal and the increased personnel traffic necessary to properly allow the SS to coordinate maintenance activities. Therefore, it would be a serious distraction to the Control Room Operators and is not practical or desirable to locate the Shift Supervisor in the Control Room Panel Area.

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THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE TOLEDO, OHIO 43652

ADD: NRR/DHFS/LQ3
NRR/DHFS/OLB

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The Assistant Shift Supervisor is responsible for supporting the SS in coordinating plant activities as well as providing direction to the rest of the operating shift. This duty includes both the Control Room operators and the plant operators. Direction of plant operators includes: hanging and pulling of equipment control tags, administrative control of all "Locked Valves", plant walkdowns, and provision of assistance to plant operators as required.

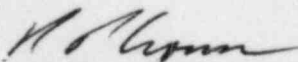
These duties require the Assistant Shift Supervisor to be outside the Control Room Panel Area approximately 50% of the time. Toledo Edison feels this "in-plant" time is essential to the safe efficient operation of Davis-Besse. Since the Assistant Shift Supervisor must provide support to the SS as required and spend time in the plant, Toledo Edison cannot comply with the requirement to have a Senior License holder in the Control Room at all times.

In lieu of full compliance, Toledo Edison requests an exemption from 10 CFR 50.54(m)(iii) and proposes the following changes to Davis-Besse procedures and operating practices:

1. The Station Operating Procedure (AD 1839.00) will be modified to require that at least one SRO will remain within security door 509 at all times.
2. A direct intercom will be installed between the Shift Supervisors office and the Control Room Panel Area to provide assured communications in the event of an emergency.
3. Guidelines will be established for one SRO to remain in the Control Room Panel Area when not required in the Shift Supervisor's office or in the plant to perform duties.
4. Whenever possible during high activity periods, an additional SRO will be assigned to supplement the two SROs normally on shift.

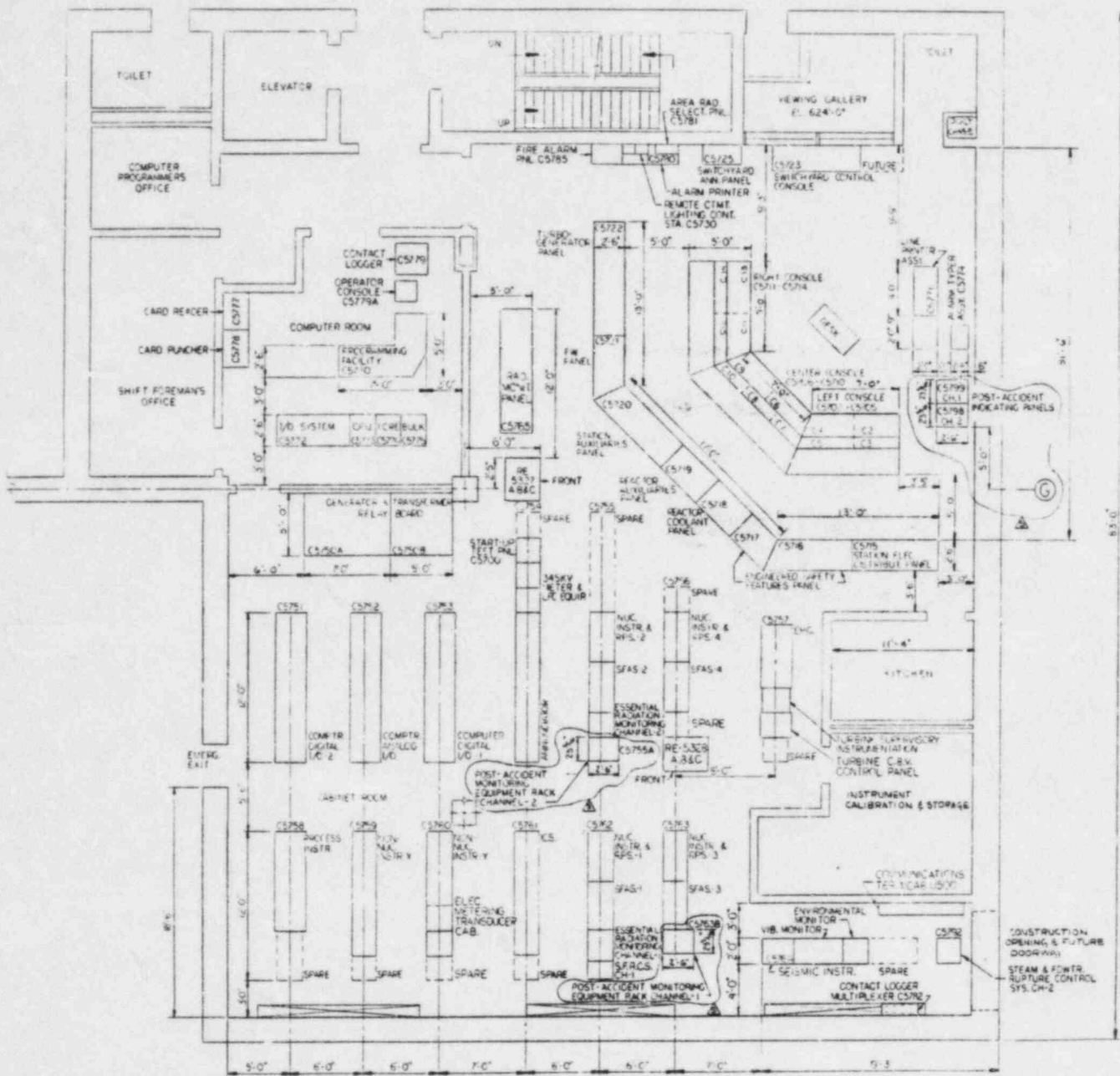
Toledo Edison believes that the reasons listed, coupled with the proposed administrative changes, justifies our request for exemption from 10 CFR 50.54(m)(iii).

Very truly yours,



RPC:WTO:GAB:lah
cc: DB-1 NRC Resident Inspector

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 Attachment 1



Control Room Area Configuration

FLOOR PLAN - EL. 623'-0"