

Docket No. 50-346

License No. NPF-3

Serial No. 1105

December 3, 1984



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

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

Dear Mr. Stolz:

Under separate cover, we are transmitting three (3) original and forty (40) conformed copies of an application for an Amendment to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station Unit No. 1.

This application requests that the Davis-Besse Nuclear Power Station Unit 1 Technical Specifications, Appendix A, be revised to reflect the changes attached. Specifically, this proposed change affects Section 1.6, "Operable-Operability", of the Technical Specifications.

This amendment request is submitted as an emergency request under 10 CFR Part 50, Section 50.91, Paragraph (5). Attachment B provides a discussion of the circumstances leading to this emergency request and justification of the need for prompt NRC action.

This proposed license amendment would allow the plant to complete reactor coolant system heat-up and conduct zero power physics testing (currently scheduled to commence December 19, 1984) prior to entering Mode 1 of the new fuel cycle (Cycle 5) utilizing the existing configuration of the Startup Feedwater Pump (SUFP) and its associated pipelines and valves. The zero power physics tests are performed to verify reactor physics parameters. Utilization of the SUFP during this time period will preclude the need to use the main feedwater system driven by steam from the auxiliary boiler and, therefore, will significantly decrease the probability of challenges to the Steam and Feedwater Rupture Control System. A detailed description of the potential consequences of utilizing the auxiliary boiler during heatup and zero power testing is provided in Attachment B.

A description of the event used to evaluate use of the SUFP during heat up and zero power physics testing is provided in Attachment D. As described in the Safety Evaluation (Attachment E), it has been determined that the use of the SUFP during this time period does not involve an unreviewed safety question. Additionally, as described in the Significant Hazards

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Consideration (Attachment F), this requested amendment does not present a significant hazard. Attachment G provides the PRA - based justification for operation of the SUFP for the estimated two week period between entering Mode 3 and entering Mode 1.

TED requests that this amendment, allowing operation of the SUFP for heatup and zero power testing, be approved by the NRC no later than December 18, 1984.

Enclosed is a check for \$150 as required by 10CFR170.12(c) for this license amendment application.

Very truly yours,



RPC:DRW:lah
Attachment

cc: DB-1 NRC Resident Inspector
State of Ohio