



RICHARD P. CROUSE
Vice President
Nuclear
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Docket No. 50-346
License No. NPF-3
Serial No. 1113
January 30, 1985

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 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. The proposed changes involve Section 3.7.7, 4.7.7, 6.10.2.m and Bases.

The attachment identifies the changes, Safety Evaluation and Significant Hazard Consideration. The proposed change concerns Technical Specifications for mechanical and hydraulic nuclear safety related snubbers.

This amendment request is a revision to a previous submittal, therefore, no fee is incurred.

Very truly yours,

RPC:GAB

Attachment

cc: DB-1 NRC Resident Inspector
State of Ohio

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APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NO. NPF-3
FOR
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NO. 1

Enclosed are forty-three (43) copies of the requested changes to the Davis-Besse Nuclear Power Station Unit No. 1 Facility Operating License No. NPF-3, together with the Safety Evaluation for the requested change.

The proposed changes include Section 3.7.7, 4.7.7, 6.10.2.m and Bases.

By /s/ R. P. Crouse
Vice President, Nuclear

Sworn and subscribed before me this 30th day of January, 1985.

/s/ Laurie A. Hinkle, nee (Brudzinski)
Notary Public State of Ohio
My Commission Expires May 16, 1986

S E A L

Docket No. 50-346
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Attachment

- I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A Technical Specifications 3.7.7, 4.7.7, 6.10.2.m and Bases.
 - A. Time required to Implement. This change is to be effective upon NRC approval.
 - B. Reason for Change (Facility Change Request 83-080 Rev. D). In response to NRC request of November 20, 1980 (Log No. 638) and revised request dated August 15, 1984 (Log No. 1581) for mechanical and hydraulic snubbers.
 - C. Safety Evaluation
(See Attached)
 - D. Significant Hazard Consideration
(See Attached)

Safety Evaluation

Title

Technical Specification amendment for hydraulic and mechanical snubbers surveillance. This amendment applies to Sections 3/4.7.7, B3/4.7.7 and 6.10.2.

Introduction

The revised surveillance program includes changes to visual and functional tests of both hydraulic and mechanical safety-related snubbers as well as maintenance of equipment and surveillance records. All safety related snubbers at Davis-Besse Unit #1 are installed for seismic event loads. Some non-safety related snubbers may be designed for other dynamic loads such as relief valve thrust in combination with the seismic loads.

References

NUREG-0103 Rev. 4 Standard Technical Specifications, ANSI/ASME OM4 and Drawing 12501-M-618.

Discussion

The safety function of all affected snubbers is to ensure the integrity of safety-related systems is maintained during and following seismic loads (definition of safety related snubbers). The safety function of the Technical Specification as a license document is to provide technical requirements for plant operation.

The change proposed is to change the functional test sample size in the Technical Specification from "at least 10 hydraulic snubbers or at least 10% of all snubbers listed in Table 3.7-3, whichever is less" to "at least 10 percent (rounded off to next highest integer) of each group of snubbers". Thereby all safety-related snubbers, both mechanical and hydraulic will be tested. Also at least a 10% representative sample will be tested. Changes to the functional test acceptance criteria assure the required function of the snubber will be documented as acceptable prior to snubber reuse. Also tables listing safety related snubbers have been deleted from the Technical Specification and placed in plant drawings and surveillance test procedures.

The additional inspections required (both hydraulic and mechanical) may increase the total man-rem exposure at Davis-Besse. In order to maintain radiation exposure ALARA, visual inspection of snubbers in high radiation zones will be performed during plant shutdowns. Personnel may use visual inspection aids such as binoculars or other visual support devices. Also, in order to maintain exposure ALARA, functional inspections may be performed on snubbers just prior to preventive maintenance. Snubbers located in low radiation areas may be inspected and tested preferentially over those in high radiation areas.

The snubber functional testing program must be conducted such that the system or train operability conform to Technical Specifications. Functional testing will require unpinning of at least one end, which in turn renders the snubber temporarily inoperable. However, to conform with Technical Specifications, the action required of station operators is to within 72 hours:

1. Restore to operable, or
2. Verify operability by engineering evaluation or
3. Declare the supported subsystem inoperable and follow the appropriate action statement, and perform an engineering evaluation within 90 days to document degradation or adverse effects.

Functional testing of 10 percent of the snubbers is required every 18 months, which means testing can be performed during refueling outages for inaccessible snubbers. Functional testing may also be performed just prior to preventive maintenance being done on snubbers in order to reduce the time when safety-related systems are unavailable. In this manner, through the use of proper administrative controls, functional testing of the snubbers can be accomplished without violating the existing Technical Specifications.

Conclusion:

The proposed change upgrades the surveillance inspection and testing of snubbers and therefore will increase the confidence level that snubbers on safety-related systems will perform as required to restrain movements during earthquakes and still allow normal movements due to thermal expansion. This confidence level will be offset slightly due to the fact that portions of safety-related systems may be inoperable during functional testing of the snubbers. However the proposed change will not introduce any new or affect the consequences of previously-analyzed accidents. Therefore, this change does not constitute an unreviewed safety question.

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Significant Hazard Consideration

The proposed amendment request for mechanical and hydraulic snubbers does not represent a Significant Hazard.

The amendment would revise the testing requirements for hydraulic shock suppressors (snubbers) and add requirements for mechanical snubber operability and testing. The proposed changes were made in response to an NRC request to upgrade the testing requirements for all safety-related snubbers to ensure a higher degree of operability. The changes involve: clarifying the frequency for visual inspections, stating the requirements for functional testing of snubbers which visually appear inoperable, adding a formula for the selection of representative sample sizes, clarifying the testing acceptance criteria, and revising the method of snubber listing to incorporate more information.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48FR14870). The examples of actions involving no significant hazards considerations include changes that constitute additional limitations or restrictions in the Technical Specifications. The proposed changes revise sections of the Technical Specifications related to hydraulic snubbers to clarify requirements and include additional testing, and incorporate both operability and testing requirements for mechanical snubbers.

Based on the above information, this amendment request would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Therefore, based on the above, the requested license amendment does not present a Significant Hazard.