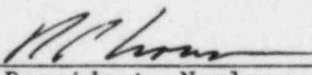



APPLICATION FOR AMENDMENT  
TO  
FACILITY OPERATING LICENSE NO. NPF-3  
FOR  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NO. 1

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 Table 3.6-2.

By   
Vice President, Nuclear

Sworn and subscribed before me this 22<sup>nd</sup> day of April, 1985.

  
Notary Public

MARY E. RICARD  
Notary Public, State of Ohio  
My Commission Expires Nov. 23, 1989

8505150362 850422  
PDR ADDCK 05000346  
P PDR

Docket No. 50-346  
License No. NPF-3  
Serial No. 1135  
April 22, 1985

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A  
Technical Specifications Table 3.6-2

- A. Time required to Implement. This change is to be effective upon NRC approval.
- B. Reason for Change (Facility Change Request 83-134).

The Containment Isolation valves in this amendment request receive an automatic open SFAS signal and not a closed signal. Therefore, the closure isolation time is not required and the valves moved from Section A to Section C of Table 3.6-2. Also, two typographical errors first there is a redundant listing of DH87 and DH88 in Section C of the same table, second the correct valve number identification for the Core Flood Tank Nitrogen Fill, Sample and Vent Lines.

- C. Safety Evaluation  
(See Attached)
- D. Significant Hazard Consideration  
(See Attached)

## SAFETY EVALUATION

This amendment request revise Table 3-6-2 of the Technical Specification for containment Isolation valves HP2A, HP2B, HP2C, HP2D, CS1530 and CS1531. The isolation time should be changed to read N/A and these valves should be removed from Part A of this table and placed in Part C. The safety function of the High Pressure Injection (HPI) valves is to open and provide borated cooling water to the reactor core in the event of a small break Loss of Coolant Accident (LOCA). The safety function of Containment Spray (CS) isolation valves is to depressurize the containment during Large Break LOCA.

The present Technical Specification requires closure response time (isolation time) for the HPI and CS isolation valves after the initiation of the Safety Features Actuation System (SFAS). These motor operated valves receive automatic signal to "OPEN" only, and there is no automatic signal to "CLOSE". Therefore, the response time requirement for these valves to close is unnecessary and should be removed from the Technical Specifications. The response time to "open" is included in Technical Specification Table 3.3-5.

Removal of response time requirements for the HPI and containment spray isolation valves to "close" will not degrade the safety function of these valves or the safety of the station since no automatic closure of these valves is required to meet any accident analysis.

Table 3.6-2 Section C contains two typographical errors. First DH87 and DH88 are listed on the bottom of page 3/4 6-21 and the top of page 3/4 6-22. The listing on page 3/4 6-22 should be removed to correct this redundancy. Second, the Core Flood Tank Nitrogen Fill, Sample and Vent line have the wrong valve identification CV should be changed to Core Flood Tank designation CF.

Therefore, based on the above this is not an unreviewed Safety Question.

cj c/8

### Significant Hazard Consideration

The proposed amendment request for the following does not represent a Significant Hazard:

1. The deletion of the isolation time for the High Pressure Injection (HPI) and Containment Spray Lines,
2. The deletion of the redundant listing for DH87 and DH88 and
3. The Correct valve number identification for the Core Flood Tank Nitrogen Fill, Sample and Vent Lines.

The HPI and CS lines are listed in Table 3.6-2 Section A "Containment Isolation" which requires isolation time (seconds) for these valves. The safety function of these valves is to open for high pressure injection into the system and containment spray. The requirement of Section 4.6.3.1.2.a requires verification "that on a containment isolation test signal, each automatic isolation valve actuates to its isolation position". The HPI and CS valves do not isolate the containment upon Safety Features Actuation System (SFAS) signal actuation. The normal valve position is closed and to perform their System Safety Function, the valves are open upon SFAS signal. Therefore, the closure time requirements of Table 3.6-2 Section A is not required. The valves should be listed in Section C. "OTHER" of the table with Isolation time "N/A".

The Core Flood Tank sample, vent and N<sub>2</sub> Fill line have the wrong valve designation. They are listed as CV, which is for the hydrogen purge system, and should be identified as CF for core flood tank. Also, identified in the amendment request is the Refueling Canal Fill line valves DH87 and DH88 penetration number 49 are listed on the bottom of page 3/4 6-21 and on the top of page 3/4 6-22.

The granting of the request would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated 10CFR50.92(C)(1).

The deletion of the closing time requirement will not increase the probability of an accident previously evaluated. The safety functions requires the isolation valves to open and not close upon actuation signal. The containment isolation valves are normally closed and the deletion of the closing time will not increase the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident previously evaluated 10CFR50.92(C)(2).

All accidents are still bounded by previous analysis and no new accidents are involved by deleting the closing time on the isolation valves for High Pressure Injection and Containment Spray Lines.

- 3) Involve a significant reduction in a margin of safety  
10CFR50.92(C)(3).

The deletion of the closing time would not reduce the margin of safety as their safety function is to open (valves are normally closed) upon SFAS signal and not close.

On the basis of the above, Toledo Edison has determined that the amendment request does not involve a significant hazard consideration.