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Docket No. 50-346

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Mr. Richard P. Crouse  
Vice President, Nuclear  
Toledo Edison Company  
Edison Plaza - Stop 712  
300 Madison Avenue  
Toledo, Ohio 43652

Dear Mr. Crouse:

SUBJECT: AUXILIARY FEEDWATER SYSTEM - TECHNICAL SPECIFICATIONS RELATED TO  
NUREG 0737, Item II.E.1.1.

By letter dated August 27, 1984 (No. 1074) Toledo Edison Company proposed certain changes to Appendix A Technical Specification Section 4.7.1.2. These proposed changes were submitted in response to our letter dated February 21, 1984.

We have reviewed the proposed changes and have concluded that certain of the changes are not acceptable. The enclosed Safety Evaluation Report (SER) identifies the specific deficiencies with your proposal.

You are requested to review the enclosed SER and submit a revised application within 45 days of receipt of this letter. With respect to the use of "flow indication" to verify flow, the use of the safety grade flow indication installed to meet the needs of NUREG 0737 Item II.E.1.2 will be acceptable if identified in the Technical Specification.

Sincerely,

"ORIGINAL SIGNED BY  
JOHN F. STOLZ"

John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Enclosure:  
Safety Evaluation

cc w/enclosure:  
See next page

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Toledo Edison Company

cc w/enclosure(s):

Mr. Donald H. Hauser, Esq.  
The Cleveland Electric  
Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

Gerald Charnoff, Esq.  
Shaw, Pittman, Potts  
and Trowbridge  
1800 M Street, N. W.  
Washington, D. C. 20036

Paul M. Smart, Esq.  
Fuller & Henry  
300 Madison Avenue  
P. O. Box 2088  
Toledo, Ohio 43603

Mr. Robert B. Borsum  
Babcock & Wilcox  
Nuclear Power Generation  
Division  
7910 Woodmont Avenue  
Suite 220  
Bethesda, Maryland 20814

President, Board of County  
Commissioners of Ottawa County  
Port Clinton, Ohio 43452

Attorney General  
Department of Attorney General  
30 East Broad Street  
Columbus, Ohio 43215

Harold Kahn, Staff Scientist  
Power Siting Commission  
361 East Broad Street  
Columbus, Ohio 43216

Mr. James G. Keppler, Regional Administrator  
U. S. Nuclear Regulatory Commisison, Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Mr. Robert F. Peters  
Manager, Nuclear Licensing  
Toledo Edison Company  
Edison Plaza  
300 Madison Avenue  
Toledo, Ohio 43652

U. S. Nuclear Regulatory Commission  
Resident Inspector's Office  
5503 N. State Route 2  
Oak Harbor, Ohio 43449

Regional Radiation Representative  
EPA Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Ohio Department of Health  
ATTN: Radiological Health  
Program Director  
P. O. Box 118  
Columbus, Ohio 43216

James W. Harris, Director (Addressee Only)  
Division of Power Generation  
Ohio Department of Industrial Relations  
2323 West 5th Avenue  
P. O. Box 825  
Columbus, Ohio 43216

SAFETY EVALUATION REPORT  
DAVIS-BESSE  
AUXILIARY FEEDWATER SYSTEM TECHNICAL SPECIFICATION CHANGES  
NUREG-0737, ITEM II.E.1.1  
AUXILIARY SYSTEMS BRANCH

The licensee submitted a proposed change to Technical Specification 4.7.1.2 by letter dated August 27, 1984. The proposed change concerns the requirements identified in our SER dated February 21, 1984 which addresses the TMI Task Action Plan NUREG-0737, Item II.E.1.1 for the auxiliary feedwater (AFW) system at Davis-Besse. In our SER, we stated that the licensee must propose technical specifications to satisfy Recommendations GS-2, GS-6, and additional short-term Recommendation 4.

The proposed technical specification changes add paragraph 4.7.1.2.a.3 which requires verification that all local manual valves in the AFW suction and discharge lines that affect the system's capacity to deliver water to the steam generator are locked in their proper positions at least once per 31 days on a staggered test basis. This proposed technical specification complies with the guidelines of Recommendation GS-2 and is, therefore, acceptable.

Recommendation GS-6 states that "The licensee should propose Technical Specifications to assure that, prior to plant startup following an extended cold shutdown, a flow test would be performed to verify the normal flow path from the primary AFW system water source to the steam generators. The flow test should be conducted with the AFW system valves in their normal alignment." In our SER, we stated that the licensee must propose technical specifications which conform to the recommendation. The licensee has proposed three new paragraphs identified as technical specification sections 4.7.1.2.b.3, 4.7.1.2.e, and 4.7.1.2.f. Paragraph 4.7.1.2.b.3 concerns verifying the flow path from the AFW pump to the steam generator by observing a level change in the steam generator or AFW flow indication every 18 months. This does not

meet the recommendation. The primary AFW water source must be used. The verification is from the primary water source to the steam generators, and the use of AFW "flow indication" is not acceptable.

Paragraph 4.7.1.2.e concerns verifying the flow path after any modification or repair to the system's capability to deliver water to the steam generator. Since repairs or modifications can be performed in mode 1 (full power operation), the words "prior to entering mode 3" are not applicable and should be deleted. If the repairs or modifications are made downstream of the test flow line, the AFW system must provide water to the steam generator. This is verified by a change in steam generator water level or AFW "flow indication." The use of an AFW "flow indication" is not acceptable. If the repairs or modifications are made upstream of the test flow line, the AFW system will pump water through the test flow line and an AFW flow indication in the test line is used to verify the flow path.

Paragraph 4.7.1.2.f concerns verifying the flow path after each extended cold shutdown which is defined as more than 30 days in mode 5. This verification is identical to paragraph 4.7.1.2.b.3. This paragraph must also be changed to have the verification from the primary water source to the steam generators and the use of the AFW "flow indication" is not acceptable. Pending receipt of an acceptable revised technical specification which incorporates the above changes for paragraphs 4.7.1.2.b.3, 4.7.1.2.e, and 4.7.1.2.f, the guidelines of Recommendation GS-6 will be satisfied.

The licensee has proposed a note to technical specification 4.7.1.2 which specifies when conducting tests of the AFW system in modes 1, 2, and 3 which require realignment of local manual valves that make the system inoperable, a dedicated individual will be stationed at the valves and in communication with the control room in order to be able to restore the system to operable status, if necessary. This proposed change to the technical specification complies with the guidelines of Additional Short-Term Recommendation 4 and is, therefore, acceptable.

Based on the above, we conclude that the licensee has proposed technical specifications which meet the guidelines of Recommendation GS-2 and Additional Short-Term Recommendation 4, and are, therefore, acceptable. Pending submittal of an acceptable revision to technical specification paragraphs 4.7.1.2.b.3, 4.7.1.2.e, and 4.7.1.2.f, we can find the proposed technical specification in conformance with Recommendation GS-6.