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Serial Number 2116

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Subject: Status of 8RFO Commitments

Gentlemen:

This letter is to document the status of several modifications previously committed to be implemented during the upcoming eighth refueling outage (8RFO) for the Davis-Besse Nuclear Power Station Unit 1. The status of these commitments was briefly discussed at the December 2, 1992 Toledo Edison and NRC Senior Management meeting.

Toledo Edison reviewed the modifications scheduled to be performed during the upcoming 8RFO relative to: 1) plant safety improvement, 2) plant reliability improvement, 3) resource availability, 4) impact on overall outage duration, and 5) current plant operating experience and practices.

As a result of this assessment one modification has been rescheduled to Cycle 9. Several modifications have been repositioned as identified in Attachment 1. These modifications are in the areas of: B&W Owners Group Safety & Performance Improvement Program (SPIP); Human Engineering Deficiencies (HED) resolution; and the Fire Protection Control Room console modification.

Attachment 1 also provides a brief summary of the original commitments and their current status.

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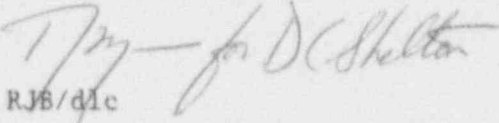
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Toledo Edison has reviewed these commitments and concludes that these redispositions will not adversely impact the continued safe operation of the Davis-Besse Nuclear Power Station.

If you have any questions, please call Mr. R. W. Schrauder,
Manager - Nuclear Licensing at (419) 249-2366.

Very truly yours,


RJB/dlc

Attachments

cc: A. B. Davis, Regional Administrator, NRC Region III
J. B. Hopkins, NRC Senior Project Manager
S. Stasek, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

B&W Owner's Group Safety and Performance Improvement Program Items

By letter dated January 24, 1986, the NRC Executive Director for Operations informed the Chairman of the B&WOG that a number of recent events at B&W designed reactors should be re-examined. B&WOG responded by committing to lead an effort to define concerns relative to reducing the frequency of reactor trips and the complexity of post trip response in B&W plants. This program was entitled Safety and Performance Improvement Program (SPIP). The SPIP developed 222 technical recommendations (TRs) that were to be evaluated by each utility for applicability to their particular plant. Of the 184 recommendations applicable to Davis-Besse, three remain open. Of these three, TR-114-PES will be completed during the upcoming eighth refueling outage. The remaining two SPIP items have been redispositioned as not necessary to implement at Davis-Besse. These are described below:

- TR-159-OPS Remote manual control of all post trip steam flow paths

TR-159-OPS provides for installation of motor operated valves to provide control room isolation of various steam paths as an operational enhancement to allow selective isolation. Toledo Edison originally proposed installation of motor operators on valves MS-709 and MS-710 for the Turbine Bypass Valve (TBV) isolation and on valve MS-850 for Auxiliary Steam Isolation. Isolation of the TBVs and Auxiliary Steam continues to be accomplished by closing the fast acting Main Steam Isolation Valves (MSIVs).

- TR-178-ICS Safe state on loss of power to ICS/NNI

TR-178-ICS provides for an automatic trip of the reactor on loss of power to Integrated Control System/Non-Nuclear Instrumentation (ICS/NNI) and activation of the Steam Feed Rupture Control System (SFRCS) along with modifying power to the atmospheric vent valves. Tripping of the reactor on loss of ICS/NNI power and initiation of SFRCS is accomplished by manual operator actions directed by plant emergency procedures. The atmospheric vent valve power modification is considered an operational enhancement to allow operation of these valves from the control room versus local manual handwheel in the event of a loss of ICS power.

Current operating experience and practices at Davis-Besse do not justify the operational enhancements proposed in TR-159-OPS and TR-178-ICS. Toledo Edison believes the SPIP intent has been fulfilled at Davis-Besse. Therefore, upon completion of TR-114-PES during 8RFO and the disposition of operational enhancement items TR-159-OPS and TR-178-ICS as noted above, the SPIP will be complete at Davis-Besse.

Human Engineering Discrepancy (HED) Resolution

In August 1990 (Serial 1820), Toledo Edison submitted an addendum to the 1988 Detailed Control Room Design Review (DCRDR) Summary Report. This addended report contained a section providing a schedule for the

completion of outstanding HEDs. In letters dated May 17, 1991 and December 1, 1991 (Serials 1938 and 1995 respectively), TE deferred completion of HED items to the end of 8RF0. Toledo Edison provides the following disposition for the remaining three HED items:

- HED 1.7.009: Operators are being electrically shocked while replacing bulbs (confined to 120V bulbs used on the Switchyard Panel C5623).

Modification 87-1252 was originally scoped to resolve this HED by adding resistors in the indicating light circuitry to lower the voltage of the indicating lights. An equally effective method of addressing this HED concern has been found by installing LED lamp replacements. Life of the LED lamps is estimated at 11 years. The LED lamps also operate at reduced temperatures. The heat generated by the old lamps damaged sockets contributing to incidences of shorting out and flashing when changing bulbs.

As the new LED lamp replacements last much longer and generate less heat causing less chance of shorting out when being replaced, the concern of being shocked while replacing the bulbs is minimized. In addition, caution labels are in place to warn operators of the shock hazard. The dropping resistor installation as originally recommended by MOD 87-1252 is no longer required.

- HED 4.1.020: Install dual light indication on motor operated throttle valves during mid stroke positions.

The intent of the corrective action for this HED was to provide dual light indication for those valves that may be in mid stroke position for extended periods of time. Of the sixteen valves requiring modification, twelve valves have been modified including the safety related valves. The four remaining valves are non-safety related. These four throttle valves are in the plant auxiliary steam system and are operated in mid position for very limited periods of time during plant shutdown to keep the Moisture Separator Reheater (MSR) tubes hot to prevent corrosion. During shutdown they are used to control the heatup rate of the MSR tubes which is monitored by the operators. These four valves have a special label on the Control Room panel to identify that they are throttle valves that have no mid stroke light indication.

The impact of not performing the MOD is considered minimal as the operators are not expected to be confused or misled during the limited time these valves are in mid position; therefore, the modification of these four remaining valves is unnecessary.

- HED 9.8.044 is to modify indication lights on motor operated valves to represent actual travel limits.

Of the approximately 150 valves requiring modification, fourteen non-safety related valves remain to be modified. The modification of these fourteen remaining valves is considered unnecessary since

these valves are non-safety related and typically used only for start-up evolutions. The impact of not performing the modification is considered minimal as these valves have information labels in place on the Control Room panel which specify for the operators the actual meaning of their limit lights.

Based upon the above redispositions Toledo Edison considers the implementation of Detailed Control Room Design Review requirements at Davis-Besse to be complete.

Fire Protection-Control Room Console Modification

In a letter dated December 17, 1986 (Log No. 2166), the NRC transmitted a request for additional information regarding Fire Protection. Question 18 of this letter requested TE to confirm that visual and audible alarms are transmitted to the control room from every fire/smoke alarm initiating device. Toledo Edison responded to the request for additional information by letter dated May 27, 1987 (Serial 1361). In responding to Question 18, Toledo Edison committed to revise the Control Room console to indicate both the local panel and the affected fire detection zone for those fire areas identified in the Fire Hazard Analysis Report (FHAR). As further stated in Serial 1361, the revisions to the console are considered enhancements and are not necessary to satisfy Appendix A to BTP APCSB 9.5-1 or 10 CFR 50, Appendix R.

By a letter dated February 16, 1990 (Serial 1757), Toledo Edison indicated that the scope of the previous commitment was being re-evaluated to determine the best approach to modify the Control Room console and that the completion of the modification had been rescheduled to the eighth refueling outage. Serial 1757 further states that the modification does not affect system operability and is not required to satisfy a regulatory commitment.

The NRC staff found TE's proposal for the Control Room Console Modification to be acceptable, as noted in the Fire Protection Safety Evaluation Report dated May 30, 1991 (Log 3480).

The Control Room console enhancement will be accomplished as part of the overall fire detection system upgrade modification which is currently in progress. This modification replaces approximately seven hundred existing detection devices with new, state-of-the-art detection devices. This modification also eliminates or replaces existing fire panels, consolidating them into a network of nine new state-of-the-art panels. Due to the extensiveness of this modification, the scheduled completion date is Cycle 9. The change in scheduled completion date for control room console enhancement will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.