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Docket Number 50-346

License Number NPF-3

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United States Nuclear Regulatory Commission
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Subject: License Amendment Application to Revise Technical Specification
Definitions, Instrumentation Technical Specifications, and
Emergency Core Cooling System Technical Specifications for
Conversion to a 24 Month Fuel Cycle

Ladies and Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear
Power Station (DBNPS), Unit Number 1 Operating License Number NPF-3,
Appendix A, Technical Specifications. The proposed changes involve:
Technical Specification (TS) Section 1.0, Definitions, Table 1.2,
Frequency Notation; TS 3/4.3.1.1, Reactor Protection System
Instrumentation; TS 3/4.3.2.1, Safety Features Actuation System
Instrumentation; TS 3/4.3.2.2, Steam and Feedwater Rupture Control System
Instrumentation; TS 3/4.3.3.1, Radiation Monitoring Instrumentation; TS
3/4.3.3.5.2, Remote Shutdown Instrumentation; TS 3/4.3.3.6, Post-Accident
Monitoring Instrumentation; TS 3/4.5.1, Emergency Core Cooling Systems
(ECCS), Core Flooding Tanks; and TS 3/4.5.2, Emergency Core Cooling
Systems, ECCS Subsystems - $T_{avg} \geq 280^{\circ}\text{F}$.

The proposed changes would revise TS Definition Table 1.2, Frequency
Notation. The frequency notations defined by Table 1.2 are utilized in
various tables in the Instrumentation Technical Specifications. Notation
"R", which is presently defined as a frequency of "At least once per 18
months," is proposed to be redefined as a frequency of "At least once per
24 months" for instrumentation surveillance frequencies being changed to
a 24 month frequency. A new Notation "E" is proposed to be used to
designate the existing frequency of "At least once per 18 months" for
instrumentation surveillance frequencies remaining on an 18 month
frequency.

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The proposed changes would also modify presently specified 18 month surveillance frequencies in certain TS Surveillance Requirements contained in the above-mentioned TS Sections to new specified frequencies of once each Refueling Interval, or once each 24 months. These changes are in accordance with the NRC guidance provided by Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," and will support conversion of the DBNPS from an 18 month to a 24 month fuel cycle.

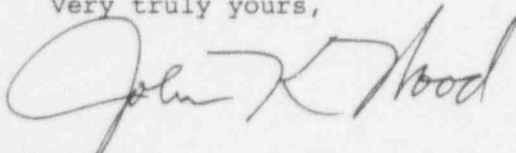
Certain TS Surveillance Requirements that are intended to remain on an 18 month frequency, but which presently utilize Notation "R", are proposed to be administratively changed to utilize the new Notation "E" described above.

The DBNPS is commencing longer fuel cycles during the current Cycle 11. This license amendment application is one of several applications which will be submitted in support of the 24 month fuel cycle conversion. These applications are being submitted to the NRC as a Cost Beneficial Licensing Action. As will be demonstrated in each license amendment application, the proposed changes will not adversely impact safety. The proposed changes will provide an estimated cost savings of \$24 million over the DBNPS's remaining life.

This amendment application includes a proposed change to Surveillance Requirement (SR) 4.5.2.d. Several additional license amendment applications scheduled to be submitted to the NRC, License Amendment Requests (LAR) 95-0019, 95-0022, and 95-0024, also affect SR 4.5.2.d. In addition, the change to TS Definition Table 1.2 redefining Notation "R" affects various other Instrumentation TS Surveillance Requirements that are not addressed by this amendment application, but that will be addressed subsequently by LAR 95-0024. Therefore, Toledo Edison requests that amendments for LAR 95-0019, 95-0022, 95-0024, and this amendment application, LAR 95-0027, be issued together by the NRC by December 5, 1997.

Should you have any questions or require additional information, please contact James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,



MKL/laj

Enclosure

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