

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
DAVIS - BESSE UNIT 1

R. Haroldsen

Published June 1985

EG&G Idaho, Inc.
Idaho Falls, Idaho 83415

Prepared for the
Nuclear Regulatory Commission
Washington, D.C. 20555
Under DOE Contract No. DE-AC07-76ID01570
FIN NO. D6001

8507120512 XA 710

ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for the Davis Besse nuclear plant for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3.

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

The U.S. Nuclear Regulatory Commission funded the work under the authorization, B&R 20-19-19-11-3, FIN NO. D6001.

Docket No. 50-346
TAC Nos. 52993 and 53831

CONTENTS

ABSTRACT	11
FOREWORD	11
1. INTRODUCTION	1
2. REVIEW REQUIREMENTS	1
3. GROUP REVIEW RESULTS	2
4. REVIEW RESULTS FOR THE DAVIS BESSE 1 PLANT	2
5. REVIEW CONCLUSIONS	3
6. REFERENCES	4

CONFORMANCE TO GENERIC LETTER 83-28

ITEMS 3.1.3 AND 3.2.3

DAVIS - BESSE - 1

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhower, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000 "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

Reviews of items 3.1.3 and 3.2.3 are being conducted on groups of similar reactor plants for which a concern identified for any plant in the group is assumed to be potentially significant for all of the plants in the group. The Davis Besse plant, however, is a unique late model operating B&W plant. It is not sufficiently similar to earlier B&W plants for the purpose of this review to be included in any larger group. The reactor trip system differs considerably from that of the earlier plants.

This report documents the EG&G Idaho, Inc. review of the submittals from the Davis-Besse Unit 1 plant for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28.

The submittals from the Toledo Edison Company (licensee for the Davis Besse plant) and the B&W Owners Group utilized in this evaluation are referenced in Section 6 of this report.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements in existing technical specifications which can be demonstrated to degrade rather than enhance safety.

Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

3. GROUP REVIEW RESULTS

The B&W Owners Group submitted a response dated November 9, 1983 to Generic Letter 83-28.³ This response states that the owners group after considerable review and discussion concluded that plant-specific differences precluded a generic program for resolving items 3.1.3 and 3.2.3.

The relevant submittals from the Licensee were reviewed to determine compliance with these two items. First, the submittals were reviewed to determine if these two items were specifically addressed. Second, the submittals were checked to determine if any post-maintenance test items specified by the technical specifications were identified that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or significant information relative to the two items.

4. REVIEW RESULTS FOR THE DAVIS BESSE 1 PLANT

The Licensees response of November 7, 1983⁴ states that no post-maintenance test requirements of Reactor Trip System Components have been identified that degrade safety. This statement provides a direct response to item 3.1.3. The submittal also addressed item 3.2.3 with a statement indicating that a program was being developed for reviewing this item in conjunction with item 2.2.2 but no conclusions were presented.

A subsequent Licensee response dated July 31, 1984⁵ reported additional review was underway and that an additional response would be submitted by January 18, 1985. The Licensee did submit a response on the promised date which reported that review was continuing on item 3.2 and other items but there is no specific response to items 3.1.3 or 3.2.3 in the submittal.

5. REVIEW CONCLUSIONS

The Licensee statement that no post-maintenance test requirements of the Reactor Trip System Components have been identified that degrade safety adequately meets the requirements of items 3.1.3 and is acceptable. The Licensee has addressed item 3.2.3 but has not stated if any post-maintenance test requirements in existing technical specifications that degrade safety have been identified. The response is therefore not adequate or acceptable for items 3.2.3. This item will be held open pending receipt and assessment of information responsive to the concern.

6. REFERENCES

1. NRC Letter, D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. B&W Owners Group Response to Generic Letter 83-28 by B&W Owners Group ATWS Committee, November 4, 1983.
4. Letter, R. P. Crouse, Toledo Edison Company to D. G. Eisenhut, NRC, November 7, 1983.
5. Letter, R. P. Crouse, Toledo Edison to J. F. Stolz, NRC, July 13, 1984.
6. Letter, R. P. Crouse, Toledo Edison to J. F. Stolz, NRC, December 2, 1984.
7. Letter, R. P. Crouse, Toledo Edison to J. F. Stolz, NRC, January 18, 1985.