

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 Section 6.5.2.9.

By /s/ Joe Williams, Jr.  
Senior Vice President, Nuclear

Sworn and subscribed before me this 26th day of July, 1985.

/s/ Nora Lynn Flood  
Notary Public, State of Ohio  
My Commission Expires Sept. 1, 1987

S E A L

Docket No. 50-346  
License No. NPF-3  
Serial No. 1170  
July 25, 1985

Attachment

I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A  
Technical Specifications Section 6.5.2.9.

- A. Time required to Implement. This change is to be effective upon NRC approval.
- B. Reason for Change (Facility Change Request 85-0122).

The proposed change is to revise who the Company Nuclear Review Board (CNRB) reports to and advises from the President and Chief Operating Officer to Senior Vice President, Nuclear. This results from restructuring of the CNRB and recent corporate reorganization. This is also in accordance with the standard Technical Specifications for B&W plants.

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

## Safety Evaluation

The proposed amendment request is to revise Section 6.5.2.9 to reflect recent Toledo Edison organizational and management responsibility changes. Section 6.5.2.9 states "The Company Nuclear Review Board (CNRB) shall report to and advise the President and Chief Operating Officer on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8". The proposed change will replace the President and Chief Operating Officer with Senior Vice President, Nuclear. Sections 6.5.2.7 and 6.5.2.8 defines the Reviews and Audits of facility activities to be performed under the cognizance of the CNRB.

The Safety Function of Section 6.5.2.9 "Authority" is provide management oversight of the audits and reviews to verify that operation of the facility is performed in a safe manner and is consistent with Company policy, approved procedures and license provisions; to review important proposed changes to the facility, tests and procedures; and to verify that unusual events are promptly investigated and their causes are corrected in a manner that reduces the probability of recurrence. When the Technical Specifications were issued, the Vice Presidents were members of the CNRB. Because of their membership on the board, the President and Chief Operating Office was designated in Section 6.5.2.9. With the issuance of License Amendment 76 dated November 5, 1984 (Log No. 1643) the Vice Presidents were removed from the CNRB providing separation of management from the CNRB duties.

On July 1, 1985, a management organizational change occurred at Toledo Edison in which the President and Chief Operating Officer retired and a new replacement was named. A new position of Senior Vice President was established replacing Vice President, Nuclear. The Senior Vice President reports directly to the Chairman and Chief Executive Officer.

This revision to the Technical Specifications only changes who the CNRB reports to and advises in relationship to Reviews and Audits. The Senior Vice President, Nuclear will assume this duty from the President and Chief Operating Officer. The proposed amendment request is consistent with the Standard Technical Specifications for B&W plants. This Amendment Request is administrative only and there are no physical or safety related functional changes, therefore this is not an unreviewed safety question.

### Significant Hazard Consideration

This amendment request to Section 6.5.2.9 "Authority," revises the Technical Specification that requires the Company Nuclear Review Board (CNRB) to report to and advise the President and Chief Operating Officer. Under the proposed change the CNRB would report to and advise the Senior Vice President, Nuclear. This amendment request does not involve a Significant Hazard.

When the Technical Specifications were issued for Davis-Besse, the Vice Presidents were members of the CNRB. Because of their membership on the board, the President and Chief Operating Officer was designated in Section 6.5.2.9. With the issuance of License Amendment 76 dated November 5, 1984, the Vice Presidents were removed from the CNRB providing separation of management from CNRB duties. On July 1, 1985, a management reorganization occurred at Toledo Edison and a new position of Senior Vice President, Nuclear was established. The Senior Vice President, Nuclear, reports directly to the Chairman and Chief Executive Officer.

The proposed amendment request only changes who the CNRB reports to and advises in relationship to Reviews and Audits. This request is consistent with the Standard Technical Specifications for B&W plants.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards considerations relates to a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

Therefore, based on the above, this amendment request is not a Significant Hazard.

cj b/12