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Docket Number 50-346

License Number NPF-3

Serial Number 2428

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United States Nuclear Regulatory Commission
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Subject: License Amendment Application to Revise Limiting Safety System
Settings, Instrumentation Technical Specifications, Reactor
Coolant System Technical Specifications, and Plant Systems
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) 2.2 Limiting Safety System Settings; TS 3/4.3.1, Reactor Protection System Instrumentation; TS 3/4.3.2.2, Steam and Feedwater Rupture Control System Instrumentation; TS 3/4.3.3.5.1, Remote Shutdown Instrumentation; TS 3/4.3.3.6, Post-Accident Monitoring Instrumentation; TS 3/4.4.3, Safety Valves and Pilot Operated Relief Valve - Operating; TS 3/4.4.6.1, Reactor Coolant System Leakage Detection Systems; TS 3/4.7.1.2, Auxiliary Feedwater System; TS Bases 2.2.1, Reactor Protection System Instrumentation Setpoints; and TS Bases 3/4.3.1 and 3/4.3.2, Reactor Protection System and Safety System Instrumentation.

There are four areas of revision proposed by this License Amendment Request:

1. Proposed Revisions to Surveillance Requirement intervals from 18 to 24 months based on the results of the DBNPS Instrument Drift Study.
2. Proposed setpoint revisions required by the results of the DBNPS Instrument Drift Study and based on NUREG-1430, Revision 1, "Standard Technical Specifications, Babcock and Wilcox Plants," dated April 1995.

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3. Proposed revisions to Technical Specification 2.2, Limiting Safety System Settings, based on the results of revised Framatome Reactor Protection System instrument string error and allowable value setpoint calculations and NUREG-1430, Revision 1, "Standard Technical Specifications, Babcock and Wilcox Plants," dated April 1995.
4. Proposed administrative revisions supporting the preceding areas of revision.

Proposed Revisions to Surveillance Requirement Intervals

The surveillance frequency of 18 months is proposed to be revised to a frequency of 24 months for the following Technical Specifications:

1. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 3, RC High Temperature, Channel Calibration.
2. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 4, Flux-DFlux-Flow, Channel Calibration as required by table notation 7.
3. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 5, RC Low Pressure, Channel Calibration.
4. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 6, RC High Pressure, Channel Calibration.
5. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 7, RC Pressure - Temperature, Channel Calibration.
6. 4.3.1.1.1 - Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, Functional Unit 14, Shutdown Bypass High Pressure, Channel Calibration.
7. 4.3.2.2.1 - Table 4.3-11, Steam and Feedwater Rupture Control System Instrumentation Surveillance Requirements, Functional Unit 1.b, Steam Generator Level - Low, Channel Calibration.
8. 4.3.3.5.1 - Table 4.3-6, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, Instrument 2, Reactor Coolant Temperature-Hot Legs, Channel Calibration.
9. 4.3.3.5.1 - Table 4.3-6, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, Instrument 3, Reactor Coolant System Pressure, Channel Calibration.

10. 4.3.3.5.1 - Table 4.3-6, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, Instrument 4, Pressurizer Level, Channel Calibration.
11. 4.3.3.5.1 - Table 4.3-6, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, Instrument 5, Steam Generator Outlet Steam Pressure, Channel Calibration.
12. 4.3.3.5.1 - Table 4.3-6, Remote Shutdown Monitoring Instrumentation Surveillance Requirements, Instrument 6, Steam Generator Startup Range Level, Channel Calibration.
13. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 1, SG Outlet Steam Pressure, Channel Calibration
14. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 2, RC Loop Outlet Temperature, Channel Calibration.
15. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 3, RC Loop Pressure, Channel Calibration.
16. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 4, Pressurizer Level, Channel Calibration.
17. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 5, SG Startup Range Level, Channel Calibration.
18. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 6, Containment Vessel Post-Accident Radiation, Containment High Range Radiation Monitors, Channel Calibration. The Containment Wide Range Noble Gas Monitors will remain on an 18 month surveillance interval.
19. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 10, RC System Subcooling Margin Monitor, Channel Calibration.
20. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 11, PORV Position Indicator, Channel Calibration.
21. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 13, Pressurizer Safety Valve Position Indicator, Channel Calibration.

22. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 15, Containment Normal Sump Level, Channel Calibration.
23. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 16, Containment Wide Range Water Level, Channel Calibration.
24. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 17, Containment Wide Range Pressure, Channel Calibration.
25. 4.3.3.6 - Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 19, Reactor Coolant Hot Leg Level (Wide Range), Channel Calibration.
26. 4.4.3 - Pilot Operated Relief Valve, Channel Calibration.
27. 4.4.6.1.b - Containment Sump Level and Flow Monitoring System, Channel Calibration.
28. 4.7.1.2.1.d - Auxiliary Feed Pump Turbine Steam Generator Level Control System, Channel Calibration.
29. 4.7.1.2.1.e - Auxiliary Feed Pump Suction Pressure Interlocks, Channel Calibration.
30. 4.7.1.2.2 - Auxiliary Feed Pump Turbine Inlet Steam Pressure Interlocks, Channel Calibration.

These proposed revisions 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."

Proposed Setpoint Revisions Required by the Results of The DENPS Instrument Drift Study

The Allowable Values for the following Technical Specifications are proposed for revision and the associated Trip Setpoint are proposed for deletion: TS 3.3.2.2, Steam and Feedwater Rupture Control System Instrumentation (SFRCS) Table 3.3-12, Functional Unit 2 (Steam Generator Level - Low). The proposed Allowable Value is to be defined as applicable to the Channel Functional Test only by application of an existing footnote in Table 3.3-12.

The Limiting Condition for Operation and Action a for TS 3.3.2.2, SFRCS Instrumentation, are proposed for revision to reflect the proposed changes to the Trip Setpoint and Allowable Values.

These proposed revisions are based on NUREG-1430, Revision 1, "Standard Technical Specifications, Babcock and Wilcox Plants," dated April 1995.

Proposed Revisions to Technical Specification 2.2, Limiting Safety System Settings

The Allowable Value for TS Table 2.2-1, Reactor Protection System Instrumentation Trip Setpoints, Functional Unit 2, High Flux is proposed for revision from 104.94% of Rated Thermal Power (RTP) with four pumps operating to 105.1% of RTP with four pumps operating.

The Trip Setpoints, Trip Setpoint column and column heading for Technical Specification Table 2.2-1, Reactor Protection System Instrumentation Trip Setpoints, are proposed for deletion and the associated Allowable Values are proposed to be defined as applicable to the Channel Functional Test only by application of an existing footnote "*" in Table 2.2-1.

Technical Specification 2.2, Limiting Safety System Settings, is proposed for revision to reflect the proposed revisions to TS Table 2.2-1.

These proposed revisions are based on the results of the revised Framatome "Reactor Protection System String Error Calculations" (document 32-1172392-02, dated July 26, 1996) and the "DBNPS Unit 1 RPS Setpoint Allowable Values Calculation" (document 32-1257719-02, dated September 25, 1996) and are consistent with NUREG-1430, Revision 1, "Standard Technical Specifications, Babcock and Wilcox Plants," dated April 1995.

Proposed Administrative Revisions

Technical Specification Table 4.3-10, Post-Accident Monitoring Instrumentation Surveillance Requirements, Instrument 6, Containment Vessel Post-Accident Radiation is proposed for revision to reflect the revision to 24 month surveillance intervals for the High Range Radiation Monitors, and to reflect that the Containment Wide Range Noble Gas monitors will remain on a 18 month surveillance frequency.

Technical Specification Bases 2.2.1, Reactor Protection System Instrumentation Setpoints, and TS Bases 3/4.3.1 and 3/4.3.2, Reactor Protection System and Safety System Instrumentation, are proposed for revision to reflect the proposed revisions to TS 2.2, Limiting Safety System Settings, and TS 3/4.3.2, Safety System Instrumentation, Safety Features Actuation System Instrumentation, and Steam and Feedwater Rupture Control System Instrumentation.

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.

License Amendment Request (LAR) 95-0027 (DBNPS letter Serial Number 2405) proposes a revision to TS Definition Table 1.2 redefining Notation "R" from "At least once per 18 months" to "At least once per 24 months" and defining a new Notation "E" as "At least once per 18 months."

There are several revisions proposed to Surveillance Requirement intervals by this LAR (95-0024) in which the interval is defined by the "R" notation and it is proposed to apply the new definition of the "R" notation discussed in LAR 95-0027.

All 18 month Surveillance Requirement intervals currently defined by the "R" notation that are to remain at 18 months will be designated by the new "E" notation. All Surveillance Requirement revisions from "R" to "E" notation are proposed under LAR 95-0027 with one exception which is discussed in this LAR.

License Amendment Request 95-0018 (DBNPS letter Serial Number 2342 dated August 7, 1996) proposes a new TS defined term, REFUELING INTERVAL, which is defined as "A period of time \leq 730 days."

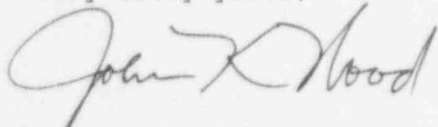
There are several revisions proposed to Surveillance Requirement intervals by this LAR (95-0024) in which the interval is proposed to be defined by this new defined term, REFUELING INTERVAL. Other instrumentation Surveillance Requirement intervals proposed to be revised to REFUELING INTERVAL are proposed in LAR 95-0027.

License Amendment Request 96-014 which addresses the instrument drift study for TS 3.3.2.1 and TS 4.3.2.1.1 (Safety Features Actuation System Instrumentation), and TS 4.5.2.d (Decay Heat Valve Interlock Channel Functional Test) is scheduled to be submitted to the NRC by May 1997.

Toledo Edison requests that amendments for LAR 95-0018, 95-0027, 96-0014, and this amendment application, LAR 95-0024, 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,



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Enclosure

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