

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 Sections 6.5.1.7.c, 6.5.1.8, 6.5.2.9, 6.5.2.10, 6.7.1.c. and 6.7.1.d.

By /s/ Terry D. Murray
Terry D. Murray, Assistant
Vice President, Nuclear

For Joe Williams, Jr.
Senior Vice President, Nuclear

Sworn and subscribed before me this 5th day of December, 1985.

/s/ Laurie A. Hinkle, nee (Brudzinski)
Notary Public, State of Ohio
My Commission Expires May 16, 1986

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Docket No. 50-346
License No. NPF-3
Serial No. 1215

Attachment

- I. Changes to Davis-Besse Nuclear Power Station Unit 1, Appendix A Technical Specification Sections 6.5.1.7.c, 6.5.1.8, 6.5.2.9, 6.5.2.10, 6.7.1.c and 6.7.1.d.

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

The proposed change is to revise whom 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 Sections 6.5.2.9, 6.5.2.10, 6.5.1.7, 6.7.1.c, 6.5.1.8, and 6.7.1.d to reflect Toledo Edison organization 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". Sections 6.5.2.7 and 6.5.2.8 define the Reviews and Audits of facility activities to be performed under the cognizance of the CNRB. Section 6.5.2.10 requires records of the CNRB activities shall be prepared, approved and distributed to CNRB members and to the President and Chief Operating Officer. These records (Section 6.5.2.10) are minutes of the CNRB Meeting, Reviews (Section 6.5.2.7) and Audits (Section 6.5.2.8). The proposed change will replace the President and Chief Operating Officer with Senior Vice President, Nuclear to reflect the organizational changes in title.

The Safety Function of Section 6.5.2.9 "Authority", 6.5.2.10 "Records", 6.5.1.8 "Records" and 6.7.1 "Safety Limit Violation" is to provide management oversight of the minutes, 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 Officer was designated in Section 6.5.2.9 and 6.5.2.10. 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 executive management from the CNRB duties.

On July 1, 1985, management organization 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, Nuclear was established replacing Vice President, Nuclear. The Senior Vice President, Nuclear reports directly to the Chairman and Chief Executive Officer.

This revision to the Technical Specifications changes the CNRB reporting requirements for Audits and Reviews (Section 6.5.2.9) and Records (Section 6.5.2.10) from the President and Chief Operating Officer to Senior Vice President, Nuclear. 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. Revision to Section 6.5.1.7, 6.5.1.8 and 6.7.1 is only a title change to reflect the current position. 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 revises Section 6.5.1.7.c, 6.5.1.8, 6.5.2.9, 6.5.2.10, 6.7.1.c and 6.7.1.d. of the Technical Specifications which 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 the Vice President, Nuclear membership on the Board, the President and Chief Operating Officer was designated in these sections. 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 operation of Davis-Besse. This request is consistent with the Standard Technical Specifications for B&W plants.

The granting of the request would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated (10 CFR 50.92(c)(1)).

This amendment request only changes who the CNRB reports to and advises in relationship to the operation of Davis-Besse. This change is administrative and in accordance with the B&W Standard Technical Specifications. This amendment request does not increase the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident previously evaluated (10 CFR 50.92(c)(2)).

All accidents are still bounded by previous analysis and no new accidents are involved.

- 3) Involve a significant reduction in a margin of safety (10 CFR 50.92(c)(3)).

All margins of safety assumed in previous analysis remain unchanged.

On the basis of the above, Toledo Edison has determined that the amendment request does not involve a significant hazard consideration.