

Auxiliaries (Station Blackout), is not affected by this proposed change. The proposed change does not involve a significant change to the plant design or operation, only to the allowed outage time, and based on a review of the available alternate A.C. power sources, the effect on probabilistic risk at power, the effect on shutdown risk, and maintenance planning and scheduling, this change has been determined to be acceptable.

1b. Not involve a significant increase in the consequences of an accident previously evaluated because the proposed change does not invalidate assumptions used in evaluating the radiological consequences of an accident, does not alter the source term or containment isolation and does not provide a new radiation release path or alter potential radiological releases.

2. Not create the possibility of a new or different kind of accident from any previously evaluated because the proposed change does not introduce a new or different accident initiator or introduce a new or different equipment failure mode or mechanism.

3. Not involve a significant reduction in the margin of safety because the proposed change does not significantly reduce the margin to safety which exists in the present Technical Specification action statements. The DBNPS USAR Section 15.2.9 evaluates the acceptability of the loss of all A.C. power to the station, including the loss of both EDGs, and the margin of safety in this analysis is not affected by the proposed change. In addition, since the issuance of the original DBNPS Operating License Technical Specifications Toledo Edison has installed a Station Blackout Diesel Generator (SBODG), comparable in continuous rating to the EDGs and capable of providing emergency A.C. power in the event all three offsite 345 kV transmission lines and the two EDGs are unavailable. This has positive effect on maintaining the margin to safety which exists in the Technical Specifications with a three day allowed outage time, which was established prior to installation of the SBODG.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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Toledo Edison Company, Centerior Service Company, and The Cleveland Electric Illuminating Company, Docket No. 50-346, Davis-Besse Nuclear Power Station, Unit No. 1, Ottawa County, Ohio

Date of amendment request: June 7, 1995

Description of amendment request: The proposed amendment would revise Technical Specification 3/4.9.4, Refueling Operations - Containment Penetrations, and associated Bases 3/4.9.4, Containment Penetrations. The proposed changes include revising the Limiting Condition for Operation (LCO) 3.9.4.b to allow both doors of the containment personnel airlock to be open during core alterations or movement of irradiated fuel within the containment, provided that certain specified conditions are met. Additional changes are proposed to revise or clarify TS LCO 3.9.4.c, TS Action 3.9.4.a, and TS Surveillance Requirement 4.9.4, and modify the Bases to reflect the requested changes.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

Toledo Edison has reviewed the proposed changes and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Plant (DBNPS), Unit No. 1, in accordance with these changes would:

1a. Not involve a significant increase in the probability of an accident previously evaluated because no Updated Safety Analysis Report (USAR) accident initiators are affected by the proposed changes.

The proposed change to TS LCO 3.9.4.b would allow both doors of the containment personnel air lock to be open during core alterations or movement of irradiated fuel within the containment, provided that certain specified conditions are met. The containment personnel air lock is not an initiator to any accident. Whether the containment personnel air lock doors are open or closed during fuel movement and core alterations has no effect on the probability of any accident previously evaluated.

The proposed clarification of TS LCO 3.9.4.c, changing the term "outside atmosphere" to "atmosphere outside containment," and the proposed change to TS LCO 3.9.4.c.1, confirming that, in addition to a manual or automatic isolation valve, or a blind flange, equivalent means may be used to close a containment penetration, have no bearing on the probability of an accident previously evaluated.

The proposed changes to TS Action 3.9.4.a, TS Surveillance Requirement (SR) 4.9.4, and TS Bases 3/4.9.4 are administrative changes

and have no bearing on the probability of an accident previously evaluated.

1b. Not involve a significant increase in the consequences of an accident previously evaluated because the proposed changes do not invalidate accident conditions or assumptions used in evaluating the radiological consequences of any accident.

The analysis results for a fuel handling accident inside containment, as presented in Section 15.4.7.3 of the DBNPS USAR, are well within the 10 CFR 100 guideline values. Since the analysis does not take credit for containment isolation, the status of the personnel air lock has no impact on the acceptability of the results. In the event of a fuel handling accident, release of radioactive material will continue to be minimized since the air lock door will remain capable of being closed. Further, the proposed change could significantly reduce the dose to workers in the containment in the event of a fuel handling accident by speeding the containment evacuation process.

Since an engineering evaluation described in proposed Bases 3/4.9.4 will ensure that a particular containment penetration closure technique is capable of restricting the release of radioactive material from a fuel handling accident, the proposed change to TS LCO 3.9.4.c.1, confirming that an equivalent means may be used to close a containment penetration, has no adverse effect on the consequences of an accident previously evaluated.

The proposed clarification of TS LCO 3.9.4.c, and the proposed changes to TS Action 3.9.4.a, TS SR 4.9.4, and TS Bases 3/4.9.4 are administrative changes and have no effect on the consequences of an accident previously evaluated.

2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because there are no new failure modes or mechanisms associated with the proposed changes, nor do the proposed changes involve any modification of plant equipment or changes in plant operational limits.

As described above, the analysis results for a fuel handling accident inside containment does not take credit for containment isolation. Thus the proposed change to TS LCO 3.9.4.b to allow both doors of the containment personnel air lock to be open during core alterations or movement of irradiated fuel within the containment could affect the release path for radioactive material released during a fuel handling accident, however no new or different kind of accident will result.

3. Not involve a significant reduction in the margin of safety.

The analysis results for a fuel handling accident inside containment, as presented in [Section 15.4.7.3 of] the DBNPS USAR, are well within the 10 CFR 100 guideline values. Since the analysis does not take credit for containment isolation, the status of the personnel air lock has no impact on the acceptability of the results.

The proposed change to TS LCO 3.9.4.c.1 regarding the use of equivalent means of containment penetration closure has no adverse impact on the margin of safety since an equivalent containment penetration