

There are no new or different accident initiators introduced by the proposed change to allow the plant to operate in Mode 3 under a limited exception, with the HPI pumps not capable of maintaining suction from the containment emergency sump (via the LPI pumps) during the recirculation phase of a LOCA. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

*Response:* No.

The proposed change allows the plant to operate in Mode 3 under a limited exception, with the HPI pumps not capable of maintaining suction from the containment emergency sump (via the LPI pumps) during the recirculation phase of a LOCA. Although the ability of the HPI pumps to draw suction from the containment emergency sump (via the LPI pumps) is a design feature credited by the Davis-Besse Nuclear Power Station USA for mitigation of various types of LOCAs, an evaluation shows that given the extremely low decay heat generation rate in the reactor core under current plant conditions, and crediting additional operator actions, in the unlikely event that a LOCA did occur while operating in Mode 3 under the proposed exception, the accident can be mitigated without crediting HPI flow during the recirculation phase. In addition, a risk evaluation has been performed and shows that the increase in core damage frequency, accounting for human error probability for the additional operator actions, would be expected to be very small. Also, in the unlikely event that a LOCA did occur while operating in Mode 3 under the proposed exception, radiological consequences would be very small compared to the accident analyses results of record, given the fission product decay over the extended plant shutdown. Accordingly, given that accident severity or consequences will not be significantly increased under the proposed change, a significant reduction in a margin of safety is not involved.

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.

*Attorney for licensee:* Mary E. O'Reilly, Attorney, FirstEnergy Corporation, 76 South Main Street, Akron, OH 44308.

*NRC Section Chief:* Anthony J. Mendiola.

*FirstEnergy Nuclear Operating Company, Docket No. 50-346, Davis-Besse Nuclear Power Station, Unit 1, Ottawa County, Ohio*

*Date of amendment request:* May 19, 2003.

*Description of amendment request:* The proposed amendment would revise

the Technical Specifications (TS) by removing the designation of safety grade as a description of the flow indication for the motor driven feedwater pump system. The licensee inadvertently requested that the flow indication be designated as safety grade in an amendment request that was approved as license Amendment No. 193.

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

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

*Response:* No.

The proposed change corrects a post modification and repair Surveillance Requirement for the Motor Driven Feedwater Pump System. This surveillance is not an initiator to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The Technical Specifications continue to require the MDFP System to be operable and capable of performing its design function. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

The proposed correction does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

*Response:* No.

The proposed correction does not result in a significant reduction in the margin of safety. The corrected Surveillance Requirement continues to ensure that the Motor Driven Feedwater Pump System can perform its required function. Thus, appropriate equipment continues to be tested in a manner that provides confidence that the equipment can perform its assumed function. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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.

*Attorney for licensee:* Mary E. O'Reilly, Attorney, FirstEnergy Corporation, 76 South Main Street, Akron, OH 44308.

*NRC Section Chief:* Anthony J. Mendiola.

*FirstEnergy Nuclear Operating Company, Docket No. 50-346, Davis-Besse Nuclear Power Station, Unit 1, Ottawa County, Ohio*

*Date of amendment request:* May 21, 2003.

*Description of amendment request:* The proposed amendment would revise the Technical Specifications (TS) by relocating to the licensee's Technical Requirements Manual the TS surveillance requirement pertaining to flow balance testing of the emergency core cooling system (ECCS) high pressure injection and low pressure injection subsystems following system modifications that alter subsystem flow characteristics. Also, the proposed amendment would add an ECCS pump operability requirement to the TS consistent with NUREG-1430, Standard Technical Specifications-Babcock and Wilcox Plants, Revision 2.

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

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

*Response:* No.

The proposed surveillance requirement relocation and replacement does not alter the design, operation, or testing of any structure system or component. No previously analyzed accident scenario is changed. Initiating conditions and assumptions remain as previously analyzed. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

The proposed surveillance requirement relocation and replacement does not alter the design, operation, or testing of any structure system or component. No new or different accident initiators are created as a result of the proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

*Response:* No.