Hello Jim:

I appreciate your setting up the call this morning between you, Jamnes Cameron, Dan Kimble and me regarding this EDG voltage issue at Davis-Besse.

If I correctly understood the information provided during the call, workers at Davis-Besse became aware of the EDG voltage issue during 2009 while reviewing operating experience from Wolf Creek. On August 27, 2009, Davis-Besse imposing stricter limits on EDG voltage per guidance in NRC Admin Letter 98-10, actually replacing the applicable pages in the technical specifications with yellow pages.

Meanwhile, Westinghouse undertook to address the EDG voltage issue generically, submitting WCAP-17308-NP to the NRC as a topical for the agency's approval.

Circa 2012, the NRC project managers informed licensees with the EDG voltage issue that it was time to submit individual license amendment requests to resolve the issue at their facilities. This led to Davis-Besse's license amendment request.

NRR posed questions in their request for additional information regarding the license amendment request that Davis-Besse felt was outside the scope of the request, prompting them to withdraw it.

Davis-Besse resubmitted the license amendment request earlier this year that NRR is currently reviewing.
The surveillance tests consistently show the EDG voltage to be 4,200 volts or higher, providing margin to the tech spec limits (both the 4,030 original one and the 4,070 yellow interim one).

As I indicated on the phone, my concern involves the validity of the yellow limit and the licensee's actions if a test showed the voltage to be above the 4,030 original tech spec limit but less than the 4,070 interim (non-NRC-approved) limit.

I've not read NRC Admin Letter 98-10 in years. I want to read it to see if it clearly conveyed the NRC's expectations if and when an administratively imposed limit were violated.

I might not be able to complete this review until early January.

As we agreed at the end of this morning's call, the NRC isn't going to process my concern within its allegation program until I get back to you with either a request to withdraw it or to refocus it on any concern remaining after this call.

Thanks again to the staff for taking the time to get back to me with this additional information,

Dave Lochbaum

UCS