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Detroit Edison

A DTE Energy Company

10CFR50.92

March 21, 2001
NRC-01-0021

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) NRC letter to Detroit Edison "Fermi 2 Issuance of Amendment Re: Spent Fuel Pool Rerack (TAC NO. MA7233)", dated January 25, 2001

3) Detroit Edison letter to NRC "Proposed Technical Specification Changes (License Amendment) – Design Features/Fuel Storage (Technical Specification 4.3) And Programs and Manuals/High Density Spent Fuel Racks (Technical Specification 5.5.13)", dated November 19, 1999

4) Detroit Edison letter to NRC "Response to Request for Additional Information on Technical Specifications Change Request Related to Spent Fuel Pool Expansion at Fermi 2 (TAC No. MA7233)", dated May 31, 2000

5) Detroit Edison letter to NRC "Response to Request for Additional Information on Technical Specifications Change Request Related to Spent Fuel Pool Expansion at Fermi 2 (TAC No. MA7233)", dated August 2, 2000

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6) Detroit Edison letter to NRC "Response to Request for Additional Information on Technical Specifications Change Request Related to Spent Fuel Pool Expansion at Fermi 2 (TAC No. MA7233)", dated October 19, 2000

7) Detroit Edison letter to NRC "Response to Request for Additional Clarifications on Technical Specifications Change Request Related to Spent Fuel Pool Expansion at Fermi 2 (TAC No. MA7233)", dated November 21, 2000

Subject: Proposed Corrections to the NRC Issued Safety Evaluation

Amendment No. 141 to Fermi 2 Operating License (Reference 2) was issued by the NRC on January 25, 2001 in response to Detroit Edison's request (Reference 3) dated November 19,1999, as supplemented May 31, August 2, October 19, and November 21, 2000 (References 4 through 7). In reviewing the Safety Evaluation issued by the NRC, Detroit Edison has identified 11 minor discrepancies. The attached table gives the "Current Wording" and the "Proposed Wording" and the basis for the proposed wording for the Safety Evaluation. Detroit Edison believes that these discrepancies are not significant and do not affect either the conclusion of the Safety Evaluation or the Technical Specifications changes. The discrepancies in the Safety Evaluation were previously discussed with the NRC Project Manager on January 30, 2001.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,

William J. O'Connor Jr.

Attachment

cc: M. A. Ring
M. A. Shuaibi
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

NRC Safety Evaluation Changes

Reference	Current Wording	Proposed Wording	Basis/Reference
Page 1, 1st paragraph under 2.0 "Background"	There is an additional rack currently installed that is designed to accommodate 35 defective SFAs.	There is an additional rack currently installed that is designed to accommodate 31 defective SFAs.	First paragraph under Background, page 2 of Enclosure 1 in Reference 3
Page 1, 2nd paragraph under 2.0 "Background"	The first campaign will include the placement of four General Electric (GE) high density storage racks (with 763 additional storage locations; Holtec International (Holtec) Racks A, B, C1, and C2).	The first campaign will include the placement of four Holtec International (Holtec) high density storage racks (Holtec Racks A, B, C1, and C2) with 763 additional storage locations.	Licensing Report, page 1-3, Section 1.2, first paragraph/ Enclosure 4 in Reference 3
Page 1, 2nd paragraph under 2.0 "Background"	The second campaign will consist of the removal of two existing racks (the defective fuel storage rack and four low density racks) and the installation of …	The second campaign will consist of the removal of two existing racks (including the defective fuel storage rack) and four low density racks and the installation of …	Licensing Report, page 1-3, Section 1.2, second paragraph/ Enclosure 4 in Reference 3
Page 2, 1st paragraph under 3.1 "Criticality"	The second phase will remove the four GE racks, the existing defective fuel storage rack, and install five high density racks.	The second phase will remove the four GE racks, the existing defective fuel storage rack, one existing Boraflex rack, and install five high density racks.	Licensing Report, page 1-3, Section 1.2, second paragraph/ Enclosure 4 in Reference 3

Reference	Current Wording	Proposed Wording	Basis/Reference
Page 3, first sentence	The current, NRC-approved, Fermi 2 analysis approach and the TSs for the SFP and existing racks state that the reactivity status, k-effective, of the SFP shall be less than 0.95 at a 95-percent probability and confidence uncertainty level.	The current, NRC-approved, Fermi 2 analysis approach and the TSs for the SFP and existing racks state that the reactivity status, k-effective, of the SFP shall be less than or equal to 0.95 at a 95-percent probability and confidence level.	Licensing Report, page 4-1, Section 4.1.1, first paragraph/ Enclosure 4 in Reference 3
Page 4, first sentence	For the new (unburned) fuel racks, the TSs retain the currently approved TSs k-effective limits of 0.90 if dry and 0.95 if fully flooded.	For the spent fuel racks, the TSs retain the currently approved TS's k-effective limits of 0.95.	Licensing Report, page 4-1, Section 4.1.1, first paragraph/ Enclosure 4 in Reference 3. There was never any mention of 0.90
Page 7, 3rd paragraph, item 4	the spatial average bulk pool temperature is required to remain under 150 degrees following a normal refueling; for a full core off-load, it should be demonstrated that bulk pool boiling does not occur with single active failure;	the spatial average bulk pool temperature is required to remain under 150 degrees following a normal refueling;	Errata Sheet Item 2/ Reference 7 and RAI 15a response/Reference 6
Page 9, 3rd paragraph	where the new fuel storage pool is located.	where the mechanical equipment storage room is located.	Licensing Report, page 8-2, Section 8.2, first paragraph and page 8-3, Section 8.3.2/Enclosure 4 in Reference 3

Reference	Current Wording	Proposed Wording	Basis/Reference
Page 13, 4th paragraph	The redundancy provided ensures that a failure of one lift rig will not result in the uncontrolled lowering of the rack module.	The redundancy provided ensures that a failure of any one of the lift rods which make up the lift rig will not result in the uncontrolled lowering of the rack module.	Licensing Report, page 10-1, Section 10.2 second paragraph/Enclosure 4 in Reference 3

Reference	Current Wording		Proposed Wording		Basis/Reference
Page 17, Table 1, item 3	2 trains of FPCCS and one division of RHR (2 FPCCS pump and 2 FPCCS heat exchangers, and 1 RHR pump and 1 RHR heat exchanger)	39.84	One division of RHR (1 RHR pump and 1 RHR heat exchanger)	30.72	Licensing Report, page 5-3, Section 5.2, third paragraph/Enclosure 4 in Reference 3
Page 19, Table 2, item 4	Normal partial core discharge with a single failure	12.20	Normal partial core discharge with a single failure	20.24	Calculated heat load corresponding to maximum pool temperature of 165° F/Holtec analysis(HI-992207)