

Donald K. Cobb
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DTE Energy



February 5, 2006
NRC-06-0011

10 CFR 50.90

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

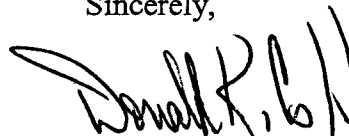
- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison Letter to NRC, "Emergency License Amendment
Request for One-Time Extension of Allowed Outage Time for the Fermi
2 Emergency Diesel Generator 12"

Subject: Response to Request for Additional Information Regarding Emergency
License Amendment Request for One-Time Extension of Allowed Outage
Time for the Fermi 2 Emergency Diesel Generator 12

In Reference 2, Detroit Edison requested NRC approval of a proposed license amendment that requests a one-time extension of allowed outage time for the Fermi 2 Emergency Diesel Generator 12 from 7 to 14 days. The NRC asked that the Operation and Maintenance Restrictions discussed in Reference 2 be explicitly described as regulatory commitments. Enclosure 1 provides a detailed description of the commitments contained in Reference 2 and additional information requested during a conference call on February 5, 2006.

If you have any questions regarding this submittal, please contact Ronald W. Gaston at (734) 586-5197.

Sincerely,



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USNRC
NRC-06-0011
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Enclosures:

1. Response to Request for Additional Information

cc: D. H. Jaffe
T. J. Kozak
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, Donald K. Cobb, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



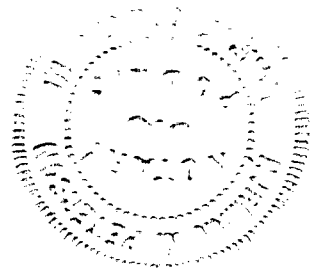
D. K. Cobb
Assistant Vice President
Nuclear Generation

On this 5th day of February, 2006 before me personally appeared Donald K. Cobb, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

NORMAN K. PETERSON
NOTARY PUBLIC MONROE CO., MI
MY COMMISSION EXPIRES Jul 24, 2008



bcc: G. D. Cerullo
D. K. Cobb
W. A. Colonnello
R. W. Gaston
R. W. Libra
M. A. Philippon
P. W. Smith
S. Stasek

Electronic Licensing Library (ELL) (200 TAC)
Information Management (140 NOC)
Michigan Department of Environmental Quality
Radiological Protection and Medical Waste Section
NSRG Administrator (200 TAC)
NRR Chron File

ENCLOSURE 1 to

NRC-06-0011

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

1. Commitments

The following identifies those actions committed to by Detroit Edison in Reference 2. Any other actions discussed in Reference 2 represent intended or planned actions by Detroit Edison, and are not regulatory commitments. The compensatory measures have been entered as regulatory commitments in the Fermi 2 Commitment Management System which complies with Nuclear Energy Institute 99-04, Revision 0, "guidelines for Managing NRC Commitment Changes."

- A. If any future submittals affect these license pages, Detroit Edison will coordinate the changes to the pages with the Nuclear Regulatory Commission (NRC) Project Manager to ensure proper page control when the associated license amendment requests are approved.
- B. The following equipment protections will be in effect until EDG 12 is restored to an Operable status:
 - 1. Elective maintenance will not be performed on EDGs 11, 13, and 14 or CTG 11-1.
 - 2. Elective maintenance will not be scheduled within the 120 kV and 345 kV switchyards that would challenge the offsite power connections or offsite power unavailability.
 - 3. Elective maintenance will not be performed on the opposite train Emergency Core Cooling System (ECCS) equipment.
 - 4. Elective maintenance will not be performed on equipment in the Standby Feedwater (SBFW) System.
- C. While in the extended EDG 12 completion time period, overall plant risk will be managed by the existing Maintenance Rule (a)(4) program. This program evaluates increases in risk posed by potential combinations of equipment out-of-service and potential increases in initiating event frequency and requires that risk recommendations be implemented as appropriate for a given plant configuration.

- D. Maintenance and testing during the allowed outage time extension will be rescheduled for Fermi 2 as warranted to minimize aggregate risk. This will specifically include:
1. Work performed on safety significant systems and their applicable support systems will be reviewed and rescheduled as necessary based upon routine and emergent Maintenance Rule 10 CFR 50.65 (a)(4) evaluations.
 2. No work will be performed that could potentially jeopardize the availability of the remaining on site emergency power sources. This will be ensured by restricting and/or controlling access to this equipment via guidance provided in MOP05 (the site procedure for control of equipment).
- E. The following actions will be taken to provide an increased assurance of grid stability:
1. No test or maintenance activities that could reduce switchyard reliability will be performed.
 2. At four hour intervals, the projected grid voltage following postulated unit trip will be verified to indicate a stable grid. Assuring the grid conditions are expected to remain stable serves to reduce the grid as an initiator for loss of offsite power to the units.
 3. Fermi 2 will contact the system dispatcher to ensure that no short-term activities adversely affecting grid stability are planned or have transpired.
 4. Fermi 2 will confirm that the system dispatcher will notify the control room or Shift Manager in the event of severe weather, system degradation, or perturbations do occur so that an appropriate plant response can be determined.
- F. Operations Briefings will be conducted on the use of CTG 11-1 and the utilization of CTG 11-2, CTG 11-3, or CTG 11-4 in conjunction with the auxiliary blackstart diesel to mitigate the consequences of a station blackout or loss of off-site power. These briefings will include review of the associated procedures.

2. License Condition

The License Condition discussed on page 4 of Reference 2 will be added as a footnote to Condition A.6 of Technical Specification 3.8.1.

3. Risk Information

The following additional risk analysis information was discussed:

1. A comparison of the NRC SPAR model assessment results of the August 2003 regional loss of power event (grid collapse) with the Fermi PRA model results was performed. The result of this comparison showed generally good agreement between the two analyses.
2. EOOS is the computer analysis tool used at Fermi for configuration risk management under 10 CFR 50.65 (a)(4).
3. An uncertainty analysis performed by a PRA consultant on the draft FermiV7 PRA model shows an Error Factor (EF) of approximately 3.
4. CTG 11-1 is the credited source of AC power at Fermi for the mitigation of Appendix R, Section III.G.3 fire scenarios.