

July 21, 2006

Mr. Donald K. Cobb  
Assistant Vice President - Nuclear Generation  
Detroit Edison Company  
Fermi, Unit 2  
6400 North Dixie Highway  
Newport, MI 48166

SUBJECT: FERMI 2 - AUDIT OF THE LICENSEE'S MANAGEMENT OF REGULATORY  
COMMITMENTS (TAC NO. MC8824)

Dear Mr. Cobb:

The Nuclear Regulatory Commission (NRC) staff is required to audit a licensee's commitment management program once every 3 years, in accordance with the NRC Office of Nuclear Reactor Regulation Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." LIC-105, which is publicly available electronically (as Accession No. ML042320463) from the Agencywide Documents Access and Management System (ADAMS) from within the public Electronic Reading Room on the Internet at the NRC web site, provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made to the NRC staff by licensees for commercial nuclear reactors. The guidance is consistent with the industry guidance prepared by the Nuclear Energy Institute (NEI) in NEI 99-04, "Guidance for Managing NRC Commitment Changes."

An audit of the commitment management program of Detroit Edison Company (the licensee) for Fermi 2 (Facility Operating License No. NPF-43) was performed at the Facility from May 8, 2006 to May 11, 2006. Based on this audit, the NRC staff concludes that: (1) the licensee had implemented NRC commitments in a timely basis; and (2) the licensee had implemented an effective program for managing NRC commitment changes. However, in Section 2.1.2 of the enclosed audit report, the NRC staff notes that, in one case (Regulatory Action and Commitment Tracking System [RACTS] 87238), the licensee lost the documentation of a commitment that was made orally to an NRC inspector. In other cases, the initiation date of the commitment was misstated (RACTS 20089, 20090, and 20091) but could be inferred from subsequent documentation. In addition, as noted in Section 2.3, the licensee should consider the need to perform audits of the Fermi 2 commitment management process.

D. Cobb

- 2 -

There is no need for the licensee to respond to this letter. The NRC staff appreciates the resources that were made available by your staff during the audit. If you have any questions, please have your staff contact me at (301) 415-1439.

Sincerely,

***/RA/***

David H. Jaffe, Sr. Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:  
Regulatory Commitments Audit Report

cc w/encl: See next page

D. Cobb

- 2 -

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Fermi 2

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
REGULATORY COMMITMENTS MADE BY DETROIT EDISON COMPANY TO  
THE NUCLEAR REGULATORY COMMISSION

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION AND BACKGROUND

On September 7, 2004, the U.S. Nuclear Regulatory Commission (NRC) published the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-105, "Managing Regulatory commitments Made by Licensees to the NRC," Revision 1. LIC-105 provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made to the NRC staff by licensees for commercial nuclear reactors. The guidance is consistent with the industry guidance issued by the Nuclear Energy Institute (NEI) in NEI 99-04, "Guidance for Managing NRC Commitment Changes." The current revision to LIC-105 is publicly available electronically (as Accession No. ML042320463) from the Agencywide Documents Access and Management System (ADAMS) from within the public Electronic Reading Room on the Internet at the NRC web site.

According to LIC-105, which cites the definition from NEI 99-04, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by a licensee, and submitted in writing on the docket to the NRC. LIC-105 further directs the NRR Project Manager to "audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.)." The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

The audit of the Detroit Edison Company (the licensee) commitment management program for Fermi 2 was performed at the Fermi 2 facility, from May 8, 2006 to May 11, 2006. Since no such audit was performed prior to the issuance of LIC-105, the NRC staff defined the scope of audit to obtain a sample of commitments created as a consequence of licensing actions and generic communications, affecting a variety of systems, structures and components, and involving a variety of technical disciplines. The selection of a valid sample for this initial audit covered a period of approximately 15 years prior to the date of the audit.

ENCLOSURE

In accordance with LIC-105, audits consist of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

## 2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments that had not yet been implemented, the NRC staff assessed whether the licensee managed regulatory commitments in an effective program for future implementation.

### 2.1.1 Audit Scope

LIC-105 limits the audit of commitments to those made (or those that should have been made) in writing to the NRC as a result of past licensing actions (amendments, reliefs exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Accordingly, the audit excluded the following types of commitments:

- commitments made on the licensee's own initiative among internal organizational components
- commitments that pertain to milestones of licensing actions/activities (e.g., response to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, technical specifications, and updated final safety analysis reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

Prior to the audit, in order to generate a list of items for the audit, the NRC staff performed public, web-based ADAMS searches for commitments. From this list, the NRC staff selected a representative sample of regulatory commitments to audit. The selection of the sample list covered a variety of systems, disciplines and licensing actions important to the NRC staff's decision-making process. This list also included commitment changes. A list of commitments and changes to commitments that were audited is contained in the attached table.

The licensee provided the documentation to support the NRC staff's audit in each of the sample areas discussed above. The licensee's documentation included summary sheets providing the status of the commitment and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The attached table summarizes the licensee's commitments that were audited by the NRC staff and the current status of the licensee's commitments.

### 2.1.2 Audit Results

The licensee's commitments are tracked by the RACTS (Regulatory Action and Commitment Tracking System) process, as documented in the licensee's procedure MLS10, Revision 11, of the same name. The RACTS process uses a relatively old software technology. The software lacks productivity tools such as spell checking or grammar checking but appears to be able (1) to adequately record activities and (2), because the RACTS identifier (a 5-digit number) is used in other documentation, to provide an adequate method of linking together the specific documents, records and actions affected as a commitment evolves into full completion, partial completion (and the creation of successor RACTS), or "on-going closed status." The age of the RACTS platform is a strength in that it provides an institutional memory over time and across successor systems performing similar functions. As an example encountered during the audit, the former document for describing and planning the solution to a problem is the Deviation Event Report (DER), and the current document is the CARD (Condition Assessment Resolution Document). Some regulatory commitments, even those that evolved to a closed condition, spanned the use of both types of documents and associated processes.

The NRC staff, therefore, undertook to ascertain that commitments had not been lost from the system because of multiple processes, aging, and turnover of personnel. During the audit, the NRC staff reviewed documents generated by processes in effect during the scope of the audit, and other documents related to the commitments.

In general, the NRC staff found that the licensee's commitment tracking programs had captured the regulatory commitments that were identified by the NRC staff before the audit. However, in one case (RACTS 87238), the licensee lost the documentation of a commitment that was made orally to an NRC inspector. In other cases, the initiation date of the commitment was misstated (RACTS 20089, 20090, and 20091), but could be inferred from subsequent documentation.

The NRC staff also reviewed plant procedures that had been revised as a result of commitments made by the licensee to NRC. The NRC staff noted that some of the new/revised procedures have annotations to refer to commitments. These annotations would serve to prevent future procedure writers from inadvertently deleting or altering an item without having gone through the commitment change process.

The NRC staff noted frequent typographical errors. Most have no technical consequence, except when the identifier for a document referenced in the RACTS narrative is corrupted. Such a failure occurred and consumed time to detect and diagnose the anomaly in the documentation. The licensee promptly corrected the problem when advised.

The incorrect information was changed directly without the use of the corrective action process. When asked about this approach, the licensee responded that the incident (dating from the late 1980's) was too old to do effective root cause analysis. There is merit to this response and, from a risk-informed approach, the expenditure of resources on this incident may not be justified. However, the need for personal vigilance in error checking is clear, since the DOS-based software platform for RACTS lacks and cannot acquire spell checking capability.

## 2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The NRC staff reviewed the licensee's process for managing commitment changes. The process is documented in procedure MLS10, Revision 11. The analysis and implementation of the proposed changes are documented in Section 6.0 of the procedure and recorded on Forms MLS10002 and MLS10003. Section 6.0 of the procedure specifically refers to NEI 99-04. The forms were compared to similar forms in NEI 99-04, as were MLS10 Revision 11 change process flow charts. The NRC staff verified the consistency of both the forms and flow charts. A Note in MLS10 Revision 11, Step 6.1.1 discusses the presence of enhancements to facilitate the processing of older commitments.

Use of the change process was observed during the examination of specific RACTS. The change process generally conformed to the guidance in NEI 99-04 and was effective in determining whether another codified change process (such as 10 CFR 50.59, 10 CFR 50.54, or 10 CFR 50.71(e)), or a license amendment process was appropriate.

Therefore, the NRC staff concludes that the procedures and forms used by the licensee to manage commitments and their changes are appropriate and effective.

## 2.3 Internal Audits of Regulatory Commitment Management

MLS10, Revision 11, Step 3.6 contains a statement that "RACTS files were not auditable" followed by an explanation that the RACTS entries contain the minimum information to determine RACTS status and identify supporting information. The NRC staff interviewed the licensee's internal auditing staff to clarify the statement and requested copies of internal audit reports. The internal auditing staff verified that RACTS was not explicitly audited, but would receive auditing attention if it was found to cause the need for corrective action. Based upon the NRC staff review, it appears that the licensee's commitment management process has not been audited.

NEI 99-04 emphasizes an "outcomes orientation" versus a "process orientation." The licensee's reliance on performance outcome to determine the need for auditing attention to RACTS is consistent with that viewpoint.

For some commitments, RACTS may affect the performance of safety-related equipment. The Fermi 2 Updated Final Safety Analysis Report, Section 17.2.18.5 "Scope and Schedule of Audits," specifically part c, states a need for an internal audit for "The results of actions to correct deficiencies in...methods of operation that affect nuclear safety..." and may indicate that RACTS performance has a safety-related function and meets the criteria for inclusion in scheduled audits.

As an example, RACTS 87063 was used to process a requalification training related commitment, intended for licensed operators and shift technical advisors, as a corrective measure in Licensee Event Report 87-007. If such commitments are also followed to completion by another audited system (e.g., the corrective action program), then a separate commitment management audit would be unnecessary.



The current MLS10, Revision 11 procedure does not exclude safety-related regulatory commitments from its purpose or scope.

### 3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) the licensee had implemented, and is tracking for future implementation regulatory commitments; and (2) the licensee has implemented an effective program to manage regulatory commitment changes.

The implications of processing safety-related regulatory commitments in a process not subject to internal audit needs further study.

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

C. Capps  
J. Louwers  
J. Moyers  
R. Newkirk  
J. Pendergast

Principal Contributors: D. Jaffe  
K. Feintuch

## Audited Fermi-2 Regulatory commitments Subject to Audit

Identifier for dispositioned Regulatory commitment	<b>RACTS description</b>  <b>RACTS = Regulatory and Commitment Tracking System (the FERMI-2 system for managing Regulatory commitments)</b> <b>DECO = Detroit Edison Company</b> <b>RgCm = abbreviation in table for Regulatory commitment</b>	Disposition of the RACTS	Auditor's Assessment of the Regulatory commitment disposition (adequate, inadequate)
5024	15-Amd 166-2 For sites possessing both operating and shutdown reactors, licensees should make a regulatory commitment to provide information to the NRC annually (e.g., with its annual submittal in accordance with 10 CFR 20.2206) to support the apportionment of station doses to differentiate between operating and shutdown units. The data will provide the summary distribution of annual whole body doses as presented in Appendix B of NUREG 0713 for each reactor type and for operating and shutdown units.	Action carried out	No issues - adequate
6676	Licensee Rpt dated 2003-11-10 RACTS NO. 6676 Test Core Spray Pumps two at a time by Division using more conservative pump performance criteria than the OM-6 Code allows.	Action carried out	No issues - adequate
6696	Licensee Rpt dated 2003-11-10 RACTS NO. 6696 Pressure Isolation Valve E11-F009 and E11-F608 will be leak tested together.	Action carried out	No issues - adequate
7650	Detroit Edison will revise the maintenance procedure pertaining to EDG bearing gap checks to address occurrence of non-manually-primed starts. The procedure will require a gap check of upper and lower crankshaft main bearings after every non-manually-primed start or 6 months, whichever occurs first.	Per DCR 96-2834 quoting DCR 93-1678 "per Amendment 94, License No. NPF-43, This is no longer required". Per DCR 96-2834 RACTS 7650 was deleted.	No issues - adequate
7724	Licensee Rpt dated 2003-11-10 RACTS NO. 7724 EDG procedure enhanced to include steps and cautions to make necessary adjustments for EDG output voltage and frequency within thirty seconds of resetting exciter.	Action carried out	No issues - adequate
20087	04-Amd 152-1 A Future updates to vessel fluence calculations will be performed in accordance with an approved methodology consistent with the requirements of NRC Regulatory Guide 1.190.	Action carried out	No issues - adequate
20087	05-Amd 152-2 A Detroit Edison will update neutron fluence calculations for the Fermi 2 RPV utilizing NRC-approved methodologies consistent with the guidance in RG 1.190 by December 31, 2005.	Action carried out	No issues - adequate
20089	03-Amd 150-4.3 Each licensee should verify that it has, and make a regulatory commitment to maintain (or make a regulatory commitment to develop and maintain), an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment.	Action carried out	RACTS line 7 should have been 5/23/2002 corresponding to licensee letter NRC-02-0025 which provides the source of the commitments, not 9/16/02.
20090	02-Amd 150-4.2 Each licensee should verify that it has, and make a regulatory commitment to maintain (or make a regulatory commitment to develop and maintain), a capability for classifying fuel damage events at the Alert level threshold (typically this is 300 µCi/ml dose equivalent iodine). This capability may utilize the normal sampling system and/or correlations of radiation readings to radioisotope concentrations in the reactor coolant.	Action carried out	RACTS line 7 should have been 5/23/2002 corresponding to licensee letter NRC-02-0025 which provides the source of the commitments, not 9/16/02.
20091	01-Amd 150-4.1 Each licensee should verify that it has, and make a regulatory commitment to maintain (or make a regulatory commitment to develop and maintain), contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, suppression pool, and containment atmosphere.	Action carried out	RACTS line 7 should have been 5/23/2002 corresponding to licensee letter NRC-02-0025 which provides the source of the commitments, not 9/16/02.

Identifier for dispositioned Regulatory commitment	<b>RACTS description</b>  <b>RACTS = Regulatory and Commitment Tracking System (the FERMI-2 system for managing Regulatory commitments)</b> <b>DECO = Detroit Edison Company</b> <b>RgCm = abbreviation in table for Regulatory commitment</b>	Disposition of the RACTS	Auditor's Assessment of the Regulatory commitment disposition (adequate, inadequate)
20154	06-DE Ltr-1 Detroit Edison will provide all the requested information in GL 2003-01, with the exception of information related to confirming that the most limiting unfiltered in leakage into the CRE is no more than the value assumed in the design basis radiological analyses for CRH, within 180 days of the date of the GL. Information confirming CRE unfiltered inleakage will be provided within 90 days from the date of performing a base line integrated CRE inleakage test of the Fermi 2 control room but no later than December 9, 2004.	Action carried out	No issues - adequate
20159	07-Amd 159-4.1 Each licensee should verify that it has, and make a regulatory commitment to maintain, a hydrogen monitoring system capable of diagnosing beyond design-basis accidents.	Action carried out	No issues - adequate
20160	08-Amd 159-4.2 For plant designs with an inerted containment, each licensee should verify that it has, and make a regulatory commitment to maintain, an oxygen monitoring system capable of verifying the status of the inert containment. (for applicable plants)	Action carried out	No issues - adequate
20172	13-Amd 164-1 The licensee provided a commitment that should Fermi 2 channels show conclusive evidence that the control blade shadow corrosion-induced channel bow is occurring at a level that would cause the approved R-factor uncertainty to be exceeded, Detroit Edison Company would submit a license amendment for Fermi 2. The NRC staff finds this commitment acceptable.	Action carried out	No issues - adequate
20203	16-Amd 167-1 Detroit Edison will incorporate the revised acceptance criterion value of 7.5 percent into the TS Bases for Fermi 2 in accordance with the Bases Control Program described in TS 5.5.10.	Action carried out	No issues - adequate
87063	Licensee Rpt dated 2005-05-31 RACTS NO. 87063: RPS actuation on level 3 indication when EI IF009 SID Cooling Inboard Isolation Valve is opened.	Action carried out	RACTS line 7 (Cm date not correct - given as 3/17/87. Should be 4/15/87. Subject was LER 87-007.)
87238	Licensee Rpt dated 2005-05-31 RACTS NO. 87238 Revise the hydrogen recombiner surveillance test procedure to include visual identification of no debris on the filters, etc	Action carried out	Not auditable - It was an oral Cm and NRC contact forms were lost per information provided to auditors during site audit.
89025	Licensee Rpt dated 2005-05-31 RACTS NO. 89025 Concern with EDG breaker logic. Procedures were revised to record the output breaker closure time.	Action carried out	No issues - adequate
89098	Licensee Rpt dated 2005-05-31 RACTS NO. 89098 Unresolved Item 88-037-09: RCIC valves not tested to verify UFSAR commitments.	Action carried out	RACTS line 7 (Could not identify source document. The date shown 1/31/1989 is that of the NRC documentation, not the licensee's commitment.)
89153	Licensee Rpt dated 2005-05-31 RACTS NO. 89153 Conduct of ISEG not in accordance with Tech Spec. 6.2.3	Licensee initially planned to modify SGP-SRI-01. RACTS narrative indicated that licensee replanned to fulfill the RgCm by modifying MLS13. MLS13 was examined during the RgCm Audit and the changes were made. Further, licensee's format provided an explanatory box near the text which attributed the text to the relevant RgCm number and associated DER, which	Licensee's methodology for changing MLS13 was both effective and, through the use of the nearby explanatory box, robust. The information in the box alerts future authors to the presence of text affected by a RgCm with background information needed for its preservation. See 89153 on Tab 3-Audit Notesheets for problems with RACTS recordkeeping and their resolution by the Licensee.

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		defines the planned approach to addressing the RgCm.	
89576	Licensee Rpt dated 2003-11-10 RACTS NO. 89576 Add RHRSW Hx discharge check valves to IST pump and valve test program.	Licensee provided a chain of evidence from RACTS identifier to DER identifier.	Licensee made oral commitment that was not documented by docketed correspondence.
93196	Licensee Rpt dated 2005-05-31 RACTS NO. 93196 To improve the process by which design changes are incorporated in programs and procedures, a comprehensive turnover checklist will be developed.	Pendergast provided copy of MES20006, Rev. 0., as requested. MES200006 is the Turnover Checklist referred to in MES20, Rev 14, Page 8, Section 3.7 and the RACTS explanation box directly before Section 3.7.	Licensee appears to have carried out the stated commitment. Further, RACTS explanation box appears to have been updated to show modifications to the commitment that permit joint walkdowns (see reference to NRC 94-0065) in areas of high radiation, heat or other significant hazards. Additional modifications (per MLS10) allow items to be marked NA if invisible to verifier and requirements are satisfied by other retrievable information.
95152	Take actions as a consequence to NRC Bulletin 95-02, which pertained to unexpected clogging of a RHR pump strainer while operating in Suppression Pool cooling mode. Actions included inspections during refueling outages. Successor RACTS and CARD actions defined frequency to alternate refuelings.	Licensee records indicated that RACTS 95152 was implemented at its original frequency, and the frequency was modified upon further analysis (CARD 01-14733). RACTS narrative accurately described the DeCo response to finding foreign material in the strainers (DER 96-1399).	<p>The Actions taken to respond to NRC Bulletin 95-02 included entry of inspections into the PM Program, modification of the frequency of inspections while within the PM Program, and responses when foreign material was found during inspections. Each of these events and actions caused additional documentation to be created. Referral within the RACTS narrative to other documents became extensive. Upon review of a sample of the content, the RACTS narrative and the descriptions and actions discussed in the additional documentation were consistent. The auditor concludes that RACTS and its data entry personnel are adequate to manage RgCm with extensive record keeping needs.</p> <p>The extensive quantity of secondary documentation made walking an audit trail difficult. The licensee has been requested to provide more direct evidence of RACTS completion (i.e., recent evidence that the inspection is currently continuing to be done at the current committed frequency, including evidence of the response to finding foreign material, if any such material has been found during the past 3 inspections.</p>
20125 and 20167	09-Amd 160-1. The SLC System Operating Procedure will be revised to describe the new system function of controlling suppression pool pH post-LOCA.	Action carried out	No issues - adequate
20125 and 20167	10-Amd 160-2. The Alarm Response Procedure for the Containment High Area Radiation Monitor will be revised to direct operators to initiate SLC when high radiation levels and LOCA symptoms are detected in the primary containment.	Action carried out	No issues - adequate
20125 and 20167	11-Amd 160-3. The plant Emergency Operating Procedures will be revised to clearly direct operators to maintain SLC injection when it is required for suppression pool water pH control.	Action carried out	No issues - adequate
20125 and 20167	12-Amd 160-4. Operator training will be updated to reflect the pH control function of the SLC system.	Action carried out	No issues - adequate
5024 and 95170	14-Amd 166-1 Each licensee should make a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in GL 97-02, by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's CDE program, currently being	Action carried out	No issues - adequate

Identifier for dispositioned Regulatory commitment	<b>RACTS description</b>  <b>RACTS = Regulatory and Commitment Tracking System (the FERMI-2 system for managing Regulatory commitments)</b> <b>DECO = Detroit Edison Company</b> <b>RgCm = abbreviation in table for Regulatory commitment</b>	Disposition of the RACTS	Auditor's Assessment of the Regulatory commitment disposition (adequate, inadequate)
<p>20209</p> <p>20209 (Part 1 contd. from previous page)</p>	<p>developed and maintained by INPO).</p> <p>Part 1 of RACTS 20209 Description</p> <p>01-Amd 171-A. If any future submittals affect these license pages, Detroit Edison will coordinate the changes to the pages with the NRC Project Manager to ensure proper page control when the associated license amendment requests are approved.</p> <p>02-Amd 171-B The following equipment protections will be in effect until EDG 12 is restored to an Operable status:</p> <p>03-Amd 171-B.1.Elective maintenance will not be performed on EDGs 11, 13, and 14 or CTG 11 1</p> <p>04-Amd 171-B.2.Elective maintenance will not be scheduled within the 120 kV and 345 kV switch yards that would challenge the offsite power connections or offsite power unavailability.</p> <p>05-Amd 171-B.3.Elective maintenance will not be performed on the opposite train Emergency Core Cooling System (ECCS) equipment.</p> <p>06-Amd 171-B.4.Elective maintenance will not be performed on equipment in the Standby Feedwater (SBFW) System.</p> <p>07-Amd 171-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.</p> <p>08-Amd 171-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:</p> <p>09-Amd 171-D 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 10CFR65 (a)(4) evaluations.</p> <p>10-Amd 171-D 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).</p>	<p>Licensee supplied the following evidence. The items are listed in chronological order.</p> <p>1-Plan of the Day (POD) 060203 (02/03/2006) discussed restricting access to EDG 13, 14 during EDG 12 outage.</p> <p>2-Night Order and Operations Log for 02/05/2006 cited NRC-06-0010 (the requesting document for the amendment) and Amendment 171 as reasons for restrictions on access and operations or EDG 13, 14 and CTG 11-1 (et al).</p> <p>3-POD 060206 had references similar to POD 060203.</p> <p>4-POD 060207 discussed the completion of the EDG 12 outage.</p>	<p>Licensee supplied the following evidence. The items are listed in chronological order.</p> <p>1-Plan of the Day (POD) 060203 (02/03/2006) discussed restricting access to EDG 13, 14 during EDG 12 outage.</p> <p>2-Night Order and Operations Log for 02/05/2006 cited NRC-06-0010 (the requesting document for the amendment) and Amendment 171 as reasons for restrictions on access and operations or EDG 13, 14 and CTG 11-1 (et al).</p> <p>3-POD 060206 had references similar to POD 060203.</p> <p>4-POD 060207 discussed the completion of the EDG 12 outage.</p>
20209	<p>Part 2 - Continuation from line 10, Amd 171-D 2</p> <p>11-Amd 171-E The following actions will be taken to provide an increased assurance of grid stability:</p> <p>12-Amd 171-E 1.No test or maintenance activities that could reduce switch yard reliability will be performed.</p> <p>13-Amd 171-E 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.</p> <p>14-Amd 171-E 3.Fermi 2 will contact the system dispatcher to ensure that no short-term activities adversely affecting grid stability are planned or have transpired.</p> <p>15-Amd 171-E 5.Fermi 2 will confirm that the system dispatcher will notify the control room or Shift Manager in the event of severe weather, system</p>	See comments in RACTS 20209 Part 1	See comments in other RACTS 20209 Part 1

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	degradation, or perturbations do occur so that an appropriate plant response can be determined. 16-Amd 171-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.		