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DTE Energy



10 CFR 50.90

March 4, 2011
NRC-11-0008

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's Letter to NRC, "Request for Approval of
Revision to the Fermi 2 Radiological Emergency Response
Preparedness Plan to Change Staff Augmentation Times,"
NRC-10-0001, dated September 24, 2010

Subject: Response to Request for Additional Information Regarding Fermi 2
Request for Approval of Revision to the Radiological Emergency
Response Preparedness Plan to Change Staff Augmentation Times

In Reference 2, Detroit Edison submitted a request for approval of a revision to the Fermi 2 Radiological Emergency Response Preparedness Plan to change staff augmentation times for the Technical Support Center related functions from 30 to 60 minutes and for the Emergency Operations Facility related functions from 60 to 90 minutes.

In an e-mail from Mr. Mahesh Chawla to Mr. Alan Hassoun dated January 24, 2011, the NRC requested additional information regarding the proposed change to the staff augmentation times.

The additional information requested by NRC staff is provided in Enclosure 1 to this letter.

As a result of the response provided in Enclosure 1, the proposed revision to Table B-1 of the RERP Plan submitted in Reference 2 has been updated. The updated proposed revision to this Table is provided in Enclosures 2 and 3 to this letter.

There are no new commitments included in this document.

Should you have any questions or require additional information, please contact Mr. Rodney W. Johnson of my staff at (734) 586-5076.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Plona", written in a cursive style.


Joseph H. Plona

Enclosures:

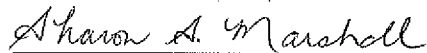
1. Response to Request for Additional Information
2. Marked-Up Emergency Plan Table B-1
3. Clean Copy Emergency Plan Table B-1

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, J. Todd Conner, 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.


J. Todd Conner
Director – Nuclear Production

On this 4 day of March, 2011 before me personally
appeared J. Todd Conner, being first duly sworn and says that he executed the foregoing
as his free act and deed.


Notary Public

SHARON S. MARSHALL
NOTARY PUBLIC, STATE OF MI
COUNTY OF MONROE
MY COMMISSION EXPIRES Jun 14, 2013
ACTING IN COUNTY OF Monroe

**Enclosure 1 to
NRC-11-0008**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**Response to Request for Additional Information Regarding Fermi 2
Request for Approval of Revision to the Radiological Emergency Response
Preparedness Plan to Change Staff Augmentation Times**

Introduction

Based on review of the RAIs, the proposed augmentation times provided in Reference 2 are being revised such that all Technical Support Center (TSC) and Operational Support Center (OSC) responders will be required to report within 60 minutes and all Emergency Operations Facility (EOF) responders will report within 90 minutes. These proposed changes are shown in Enclosure 2 to this letter, "Marked-Up" Emergency Plan Table B-1 and Enclosure 3, "Clean copy" Emergency Plan Table B-1.

Additionally, Enclosures 2 and 3 include a clarification to the reporting location of the "RET Sampler or RP Technician" responders assigned to perform offsite surveys. As shown in the updated Table B-1, the first two responders are assigned to the OSC and the second two responders are assigned to the EOF.

The following table highlights the changes from the previous proposed changes included in Reference 2.

Task	Location	Title	Original Proposal	Revised Proposal
Offsite Surveys	OSC	RET Sampler or RP Technician	2 at 60 minutes (clarification only)	2 at 60 minutes
Offsite Surveys	EOF	RET Sampler or RP Technician	2 at 90 minutes (clarification only)	2 at 90 minutes
Onsite (out of plant) Surveys	OSC	RET Sampler or RP Technician	1 at 60 minutes 1 at 90 minutes	2 at 60 minutes
In plant Surveys	OSC	RP Technician	1 at 60 minutes 1 at 90 minutes	2 at 60 minutes
Repair and Corrective Actions	OSC	Damage Control and Rescue Team Members	2 at 60 minutes 3 at 90 minutes	5 at 60 minutes
Radiation Protection	OSC	RP Technicians	2 at 60 minutes 2 at 90 minutes	4 at 60 minutes

Response to Request for Additional Information Regarding Fermi 2 Request for Approval of Revision to the Radiological Emergency Response Preparedness Plan to Change Staff Augmentation Times:

RAI # 1:

The application letter states in part, "a copy of the application, with attachments, is being provided to the designated Michigan State Official."

Has this proposed change been discussed and coordinated with State and local response organizations?

What are the activation times of State and local response organizations' facilities and how does that relate to the requested change to extend the activation time of the Fermi EOF to 90 minutes?

If activation times of the State and local response organizations' facilities are less than the requested change to 90 minutes, how will the coordination with these organizations be performed?

Response:

The proposed changes have been discussed and coordinated with State and local emergency response officials.

There is not a direct relationship between the State and local response organizations' activation times and the proposed change of the Fermi 2 EOF activation time to 90 minutes. Activation times for the State and local response organization facilities are not correlated to the declaration of event classifications. The timeframe for activation after a decision has been made to mobilize is not pre-designated. The expectation is that activation will occur as quickly as possible considering the activities that may be in progress and the actions that may be necessary to activate.

RAI # 2:

The application states in part, "will increase the staff augmentation times for Technical Support Center-related functions from 30 to 60 minutes and for Emergency Operations Facility-related functions from 60 to 90 minutes." The proposed Table B-1 includes OSC responders as 90 minute responders, specifically six RP Technicians, and three Damage Control and Rescue Team Members. What EOF-related functions do these OSC responders perform?

Response:

There are no EOF-related functions performed by the OSC responders.

As shown in the updated version of Table B-1 in Enclosures 2 and 3, all OSC responders are now proposed to be 60 minute responders.

RAI # 3:

The application states, "On-site, out of plant field teams and off-site field teams are typically used to verify the status of a potential release, but are not relied upon for timely indication. Installed effluent radiation monitors and in-plant radiation monitors would be able to detect any radioactive release quickly and accurately." Additionally it states, "Although off-site survey data is available after the emergency response facilities are activated, monitoring of installed plant radiological instrumentation is sufficient for the first 90 minutes of an accident." Please provide justification for the increase in augmentation times for RP staff performing offsite and onsite (out of plant) surveys from 60 to 90 minutes with regard to the timely indication of a radiological release from an unmonitored release point.

Response:

"RET Samplers or RP Technicians" assigned to the OSC for offsite and onsite (out of plant) surveys can perform these tasks until the EOF is activated at 90 minutes. The increase in the augmentation time for the EOF from 60 to 90 minutes does not significantly impact the capability to obtain timely indication of a radiological release from an unmonitored release point.

There are two "RET Sampler or RP Technician" responders to support offsite surveys assigned to the OSC which have a proposed augmentation time of 60 minutes. In addition, there are two "RET Sampler or RP Technician" 60 minute responders to support onsite (out of plant) surveys assigned to the OSC as shown in the updated Table B-1 in Enclosures 2 and 3.

These personnel and the two on-shift In-plant Survey RP Technicians, can also be used to identify areas where an unmonitored release occurs. These areas can be determined by reviewing the accident sequence and its correlation to installed in plant area radiation monitors. This will support the identification of areas of potential release points should the primary or secondary containments fail.

RAI # 4:

Please provide the make-up of the on-shift Fire Brigade, and discuss whether they have any collateral Emergency Plan functions/responsibilities affected by proposed Plan change.

Response:

As stated in Reference 2, Enclosure 1, Section 5.7, there are no proposed changes to this area.

The on-shift Fire Brigade is assigned this task throughout the emergency.

The on-shift Fire Brigade consists of a minimum of five qualified personnel (e.g. one Fire Brigade Leader and four operators).

The on-shift Fire Brigade has no collateral Emergency Plan functions/responsibilities.

RAI # 5:

The current Fermi Table B-1 has the six RP Technicians, and three Damage Control and Rescue Team Members responding at 60 minutes with all other on-site 60 minute emergency response facilities responders. With the proposed changes in the staffing times for these responders, the OSC would only have approximately half of the personnel in these positions at 60 minutes while the TSC would be staffed. Please provide justification for the increase in augmentation times to 90 minutes for the OSC 60 minute responders, specifically the six RP Technicians, and three Damage Control and Rescue Team Members with the TSC staffed/activated at 60 minutes. This justification should include any potential impacts to the ability of the OSC to support the TSC.

Response:

As previously discussed, Detroit Edison is modifying the proposed change for all OSC responders to now have a 60 minute augmentation time. Therefore, justification for the increase in augmentation time from 60 to 90 minutes for OSC positions is no longer applicable. The proposed updated change eliminates the potential impact of a partially staffed OSC supporting a fully staffed TSC.

**Enclosure 2 to
NRC-11-0008**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

Marked-Up Emergency Plan Table B-1

Affected Page:

RERP Plan Page B-3

**TABLE B-1
STAFFING FOR FERM I 2
EMERGENCY RESPONSE ORGANIZATION**

Major Functional Area	Major Tasks	Locations	Emergency Response Organizational Title	On Shift	Alert (or higher) +30 60 min	Alert (or higher) +60 90 min
Plant Operations and Assessment of Operational Aspects	Plant Operations and Assessment, Accident Mitigation, Corrective Actions, Damage Assessment	CR	Control Room Supervisor	1		
		CR	Nuclear Supervising Operator	3		
		CR	Non-Licensed Operator	5		
Emergency Direction and Control		CR	Emergency Director	1		
		TSC	Emergency Director		1	
Notification/Communication	Notify ERO, State, Local and Federal Authorities, Maintain Communications	CR	Communicator	1*		
		TSC	Communicator		1	
		EOF	Communicator			2
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Officer	EOF	Emergency Officer			1
	Offsite Dose Assessment	CR/OSC	Chemistry Technician	1*		
		TSC	Radiation Protection Advisor		1	
		EOF	Radiation Protection Coordinator			1
	Offsite Surveys	OSC/EOF	RET Sampler or RP Technician		2	2
		EOF	RET Sampler or RP Technician			2
	Onsite (out of plant) Surveys	OSC	RET Sampler or RP Technician		+ 2	+
	In plant Surveys	OSC	RP Technicians	2	+ 2	+
Plant System Engineering, Repair and Corrective Actions	Technical Support	CR	Shift Technical Advisor	1		
		TSC	Technical Engineer or Nuclear Safety Advisor		1	+
		TSC	Support Engineer		1	+
		OSC	OSC Coordinator		1	
	Repair and Corrective Actions	OSC	Damage Control and Rescue Team Members	2	2-5	3
Protective Actions (In Plant)	Radiation Protection: 1. Access Control 2. HP coverage for repair, corrective actions, search and rescue, first-aid and fire-fighting 3. Personnel monitoring 4. Dosimetry	OSC	RP Technicians	2*	2-4	2
Fire Fighting		OSC	Fire Brigade	UFSAR		
Rescue Operations and First Aid		OSC	Damage Control and Rescue Teams	2*		
Site Access Control and Personnel Accountability	Security and Personnel Accountability	Per Security Plan	Nuclear Security Force	Per Security Plan		
Total				16	+2-21	+5-6

* May be provided by shift personnel assigned other functions and not included in the total.

**Enclosure 3 to
NRC-11-0008**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

Clean Copy Emergency Plan Table B-1

Affected Page:

RERP Plan Page B-3

**TABLE B-1
STAFFING FOR FERMII 2
EMERGENCY RESPONSE ORGANIZATION**

Major Functional Area	Major Tasks	Locations	Emergency Response Organizational Title	On Shift	Alert (or higher) 60 min	Alert (or higher) 90 min
Plant Operations and Assessment of Operational Aspects	Plant Operations and Assessment, Accident Mitigation, Corrective Actions, Damage Assessment	CR	Control Room Supervisor	1		
		CR	Nuclear Supervising Operator	3		
		CR	Non-Licensed Operator	5		
Emergency Direction and Control		CR	Emergency Director	1		
		TSC	Emergency Director		1	
Notification/Communication	Notify ERO, State, Local and Federal Authorities, Maintain Communications	CR	Communicator	1*		
		TSC	Communicator		1	
		EOF	Communicator			2
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Officer	EOF	Emergency Officer			1
	Offsite Dose Assessment	CR/OSC	Chemistry Technician	1*		
		TSC	Radiation Protection Advisor		1	
	Offsite Surveys	EOF	Radiation Protection Coordinator			1
		OSC	RET Sampler or RP Technician		2	
	Onsite (out of plant) Surveys	EOF	RET Sampler or RP Technician			2
		OSC	RET Sampler or RP Technician		2	
	In plant Surveys	OSC	RP Technicians	2	2	
Plant System Engineering, Repair and Corrective Actions	Technical Support	CR	Shift Technical Advisor	1		
		TSC	Technical Engineer or Nuclear Safety Advisor		1	
		TSC	Support Engineer		1	
		OSC	OSC Coordinator		1	
	Repair and Corrective Actions	OSC	Damage Control and Rescue Team Members	2	5	
Protective Actions (In Plant)	Radiation Protection: 1. Access Control 2. HP coverage for repair, corrective actions, search and rescue, first-aid and fire-fighting 3. Personnel monitoring 4. Dosimetry	OSC	RP Technicians	2*	4	
Fire Fighting		OSC	Fire Brigade	UFSAR		
Rescue Operations and First Aid		OSC	Damage Control and Rescue Teams	2*		
Site Access Control and Personnel Accountability	Security and Personnel Accountability	Per Security Plan	Nuclear Security Force	Per Security Plan		
Total				16	21	6

* May be provided by shift personnel assigned other functions and not included in the total.