



10 CFR 52.79

August 26, 2011
NRC3-11-0035

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

- References:
- 1) Fermi 3
Docket No. 52-033
 - 2) Letter from Jerry Hale (USNRC) to Peter W. Smith (Detroit Edison), "Request for Additional Information Letter No. 7 Related to the SRP Sections 03.07.01-1, 12.03-12.04-3, 05.03.01-1, 03.07.01-2, 03.07.02-1, 12.02-3, and 12.02-4 for the Fermi 3 Combined License Application," dated June 23, 2009
 - 3) Letter from Jerry Hale (USNRC) to Jack M. Davis (Detroit Edison), "Request for Additional Information Letter No. 26 Related to the SRP Sections 12.2.2, 13.6.1, 14.3.2, 14.3.12 and 17.5 for the Fermi 3 Combined License Application," dated March 18, 2010
 - 4) Letter from Michael Eudy (USNRC) to Jack M. Davis (Detroit Edison), "Request for Additional Information Letter No. 64 Related to Section 9.2.4 for the Fermi 3 Combined License Application," dated July 27, 2011
 - 5) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 7," NRC3-09-0021, dated August 25, 2009
 - 6) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Supplemental Responses to NRC Request for Additional Information Letters No. 7 & 12," NRC3-09-0039, dated November 9, 2009
 - 7) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 26, Related to SRP Section 17.5," NRC3-10-0019, dated May 10, 2010
 - 8) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 64," NRC3-11-0031, dated August 12, 2011

Subject: Detroit Edison Company Supplemental Responses to NRC Request for Additional Information Letter Nos. 7, 26, and 64

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In References 2 through 4, the NRC requested additional information to support the review of certain portions of the Fermi 3 Combined License Application (COLA). Responses to those Requests for Additional Information (RAIs) were provided in References 5 through 8. Attachments 1 through 3 of this letter provide supplemental responses to portions of References 5 through 8.

Information contained in these responses will be incorporated into a future COLA submission as described in the RAI responses.

If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 26th day of August 2011.

Sincerely,



Peter W. Smith, Director
Nuclear Development – Licensing and Engineering
Detroit Edison Company

Attachments: 1) Supplemental Response to RAI Letter No. 7 (Question Nos. 03.07.01-1 and 03.07.01-2)
 2) Supplemental Response to RAI Letter No. 26 (Question No. 17.5-19)
 3) Supplemental Response to RAI Letter No. 64 (Question No. 09.02.04-1)

cc: Adrian Muniz, NRC Fermi 3 Project Manager
 Jerry Hale, NRC Fermi 3 Project Manager
 Michael Eudy, NRC Fermi 3 Project Manager (w/o attachment)
 Raj Anand, NRC Fermi 3 Project Manager (w/o attachment)
 Bruce Olson, NRC Fermi 3 Environmental Project Manager (w/o attachment)
 Fermi 2 Resident Inspector (w/o attachment)
 NRC Region III Regional Administrator (w/o attachment)
 NRC Region II Regional Administrator (w/o attachment)
 Supervisor, Electric Operators, Michigan Public Service Commission (w/o attachment)
 Michigan Department of Natural Resources and Environment
 Radiological Protection Section (w/o attachment)

Attachment 1
NRC3-11-0035
(3 pages)

Supplemental Response to RAI Letter No. 7
(eRAI Tracking Nos. 2651 and 2783)

RAI Question Nos. 03.07.01-1 and 03.07.01-2

NRC RAIs

RAI 03.07.01-1

10 CFR 50 Appendix S requires that the Safe Shutdown Earthquake (SSE) Ground Motion for the site be characterized by both horizontal and vertical free-field ground motion response spectra at the free ground surface. For application to engineering designs, site-specific GMRS determined at the foundation level of seismic category I structures are bounded by CSDRS. However, a site-specific SSE should be established as free-field ground motion response spectra that would be used to determine whether the plant shutdown would be required following a seismic event. The NRC staff requests that the applicant specify in FSAR Section 3.7.1 both the site-specific SSE and the corresponding OBE which would be required for operating the plant and setting up the seismic instrumentation as required in FSAR Section 3.7.4.

RAI 03.07.01-2

FSAR Section 3.7.1.1, Design Ground Motion, lists a supplemental information item EF3 SUP 3.7-2, which states: 3.7.1.1.5 Site-Specific Design Ground Motion Time History EF3 SUP 3.7-2. The sitespecific earthquake ground motion time history is described in Subsection 2.5.4. The staff review appears to indicate that such information is not included in Section 2.5.4. Please identify the appropriate FSAR texts and associated figures in Section 2.5.4 that describe the site-specific earthquake ground motion time history.

Supplemental Response

Detroit Edison initially provided responses to NRC RAIs 03.07.01-1 and 03.07.01-2 (eRAI Tracking Nos. 2651 and 2783) in Detroit Edison letter NRC3-09-0021, dated August 25, 2009 (ML092580311). Supplemental responses to both RAIs were provided in Detroit Edison letter NRC3-09-0039, dated November 9, 2009 (ML093160322).

As discussed in a conference call with the NRC on August 18, 2011, Detroit Edison submitted a response to RAI 02.05.04-38 that incorporated the Fermi 3 site-specific soil-structure interaction (SSI) analyses in letter NRC3-11-0020, dated June 17, 2011 (ML11171A568). During the development of the site-specific SSI analyses and the response to RAI 02.05.04-38, the applicability of previously submitted RAI responses was evaluated, and information in those responses was incorporated as necessary.

That response included markups to FSAR Subsection 3.7.1, which provided the revised safe shutdown earthquake (SSE), operating basis earthquake (OBE), and the Fermi 3 site-specific ground motion time histories. Therefore, the SSE, OBE, and site-specific ground motion time histories provided in the responses to RAI 03.07.01-1 and 03.07.01-2 have been replaced by those submitted in the response to RAI 02.05.04-38.

The responses to RAIs 03.07.02-1, 03.07.02-2, 03.07.02-3, and 03.07.02-4 were unaffected by the response to RAI 02.05.04-38. No changes were made to the design or location of any site-specific structures, and all site-specific non-Category I structures remain located at least a distance of their height above grade from Seismic Category I structures.

Proposed COLA Revision

None.

Attachment 2
NRC3-11-0035
(22 pages)

Supplemental Response to RAI Letter No. 26
(eRAI Tracking No. 4412)

RAI Question No. 17.5-19

NRC RAI 17.5-19

10 CFR 52.79(a) requires the applicant FSAR to contain sufficient depth of information to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license. 10 CFR 52.79(a)(25) requires the applicant to provide a QA program consistent with Appendix B to 10 CFR Part 50 for design, fabrication and construction activities.

Appendix B establishes quality assurance requirements for the design, manufacture, construction, and operation of the structures, systems, and components of the facility. The pertinent requirements of this appendix apply to all activities affecting the safety-related functions of the structures, systems, and components to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

Regulatory Guide 1.206 section C.I.17.5.3 states that the FSAR should 1) describe how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations, 2) should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented, 3) identify major work interfaces for activities affecting quality, and 4) describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Attachment 3 to NRC3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No. 10," dated September 30, 2009, states the following attributes from Reg. Guide 1.206, C.I.17.5.3 are discussed for each of the three distinct project periods:

- 1. Description of how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations;*
- 2. Identification of the responsible organization and the process for verifying that delegated QA functions are effectively implemented;*
- 3. Identification of major work interfaces for activities affecting quality, and*
- 4. Description of how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.*

The NRC staff has reviewed Attachment 3 to NRC3-09-0027, which includes proposed changes to FSAR part 2, chapter 17.5, and found it included descriptive project information that leads to a better understanding of the history of the Fermi 3 project. Furthermore, the NRC staff determined that the information presented did not fully address the four attributes contained in Regulatory Guide 1.206 section C.I.17.5.3, as stated in Attachment 3, nor did it provide justification for any exceptions to the Regulatory Guide 1.206 guidance.

Please clarify how FSAR part 2, chapter 17.5, meets the requirements of 10 CFR 52.79(a)(25) through the guidance provided in Regulatory Guide 1.206, or alternatively, provide justification for any exceptions to the guidance. Specifically, describe how the four attributes from Regulatory Guide 1.206 section C.I.17.5.3 are met for the Fermi 3 project for each of the three project periods presented in Attachment 3 to NRC3-09-0027.

Note: This RAI is supplemental to RAI 17.5-3 included in NRC RAI Letter No. 10, dated August 12, 2009.

Supplemental Response

Detroit Edison provided a response to NRC RAI 17.5-19 (eRAI Tracking No. 4412) in Detroit Edison letter NRC3-10-0019, dated May 10, 2010 (ML101320254), which contained a COLA markup that included a new table, FSAR Table 17.5-201, "Quality Assurance Activities for FSAR Section and Supporting Activities."

As discussed in a conference call with the NRC on August 18, 2011, when this markup was incorporated into the Fermi 3 COLA, Rev. 3, Fermi 3 plant-specific COL item "EF3 COL 12.2-2.A" was incorrectly annotated throughout FSAR Table 17.5-201. The attached markup provides a correction to FSAR Table 17.5-201 to annotate Fermi 3 plant-specific COL item "EF3 SUP 17.5-2."

Proposed COLA Revision

FSAR Table 17.5-201 is revised as shown on the attached markup.

Markup of Detroit Edison COLA
(following 18 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in the next submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 1 of 18) [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.0 Section Development | April 16, 2008 – June 17, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | June 17, 2008 | Initial Review/Acceptance June 18, 2008 – July 9, 2008 Final Review/Acceptance July 3, 2008 – September 16, 2008 |
| FSAR Section 2.1 Section Development | December 17, 2007 – June 6, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | June 6, 2008 | Initial Review/Acceptance June 6, 2008 – July 11, 2008 Final Review/Acceptance July 3, 2008 – September 16, 2008 |
| FSAR Section 2.2 Section Development | September 28, 2007 – June 5, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 5, 2008 | Initial Review/Acceptance June 5, 2008 – July 8, 2008 Final Review/Acceptance July 3, 2008 – September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 2 of 18) → [EF3 COL 12.2-2-A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.2 Chemical Hazards Calculation | July 30, 2007 – July 31, 2008 | By Numerical Applications Inc. (NAI) using HABIT computer code under the NAI QA Plan NAI-QA-1, Revision 14. Contract for work on Fermi project established between B&V and NAI on June 18, 2007. | NAI QA (as accepted by B&V) | B&V performed audit to establish NAI as a qualified supplier on November 29, 2006. NAI deliverable reviewed per B&V Nuclear Procedures. | July 31, 2008 | Note 2 |
| FSAR Sections 2.3.1 through 2.3.3 Section Development | August 27, 2007 – May 24, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | May 24, 2008 | Initial Review/Acceptance June 6, 2008 – July 11, 2008 Final Review/Acceptance August 15, 2008 – September 16, 2008 |
| FSAR Sections 2.3.4 and 2.3.5 Section Development | August 27 2007 – June 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instruction. Section validated per B&V Project Instructions. | June 10, 2008 | Initial Review/Acceptance June 10, 2008 – July 29, 2008 Final Review/Acceptance August 15, 2008 – September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 3 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|--|--|--|---|---|----------------------------|---|
| FSAR Section 2.3.4 Short Term X/Q Analysis | December 14, 2007 – August 8, 2008 | By Numerical Applications Inc. (NAI) using PAVAN computer code under the NAI QA Plan NAI-QA-1, Revision 14. Contract for work on Fermi project established between B&V and NAI on June 18, 2007. | NAI QA (as accepted by B&V) | B&V performed audit to establish NAI as a qualified supplier on November 29, 2006. NAI deliverable reviewed per B&V Nuclear Procedures. | August 8, 2008 | Note 2 |
| FSAR Section 2.3.4 On-Site X/Q Analysis | December 14, 2007 – August 8, 2008 | By Numerical Applications Inc. (NAI) using ARCON96 computer code under the NAI QA Plan NAI-QA-1, Revision 14. Contract for work on Fermi project established between B&V and NAI on June 18, 2007. | NAI QA (as accepted by B&V) | B&V performed audit to establish NAI as a qualified supplier on November 29, 2006. NAI deliverable reviewed per B&V Nuclear Procedures. | August 8, 2008 | Note 2 |
| FSAR Section 2.3.5 Long Term X/Q Analysis | December 14, 2007 – August 8, 2008 | By Numerical Applications Inc. (NAI) using XOQDOQ computer code under the NAI QA Plan NAI-QA-1, Revision 14. Contract for work on Fermi project established between B&V and NAI on June 18, 2007. | NAI QA (as accepted by B&V) | B&V performed audit to establish NAI as a qualified supplier on November 29, 2006 NAI deliverable reviewed per B&V Nuclear Procedures. | August 8, 2008 | Note 2 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 4 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.4.1 Section Development | December 13, 2007 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance July 3, 2008 - September 16, 2008 |
| FSAR Section 2.4.2 Section Development | February 13, 2008 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.3 Section Development | February 13, 2008 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 5 of 18) → [EF3 COL 12.2-2-A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|--|
| FSAR Section 2.4.4 Section Development | February 18, 2008 – April 11, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 11, 2008 | Initial Review/Acceptance April 11, 2008 – June 27, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.5 Section Development | March 13, 2008 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.6 Section Development | February 18, 2008 – April 11, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 11, 2008 | Initial Review/Acceptance April 11, 2008 – June 27, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 6 of 18) → [EF3 COL 12.2 2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|--|
| FSAR Section 2.4.7 Section Development | February 18, 2008 – April 11, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 11, 2008 | Initial Review/Acceptance April 11, 2008 – June 27, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.8 Section Development | August 30, 2007 – April 11, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 11, 2008 | Initial Review/Acceptance April 11, 2008 – June 27, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.9 Section Development | January 24, 2008 – April 11, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 11, 2008 | Initial Review/Acceptance April 11, 2008 – June 27, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 7 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.4.10 Section Development | April 24, 2008 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.11 Section Development | January 30, 2008 – June 3, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | June 3, 2008 | Initial Review/Acceptance June 3, 2008 – July 9, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.12 Section Development | February 29, 2008 – June 5, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 5, 2008 | Initial Review/Acceptance June 5, 2008 – July 28, 2008 Final Review/Acceptance July 3, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 8 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|--|--|--|---|---|--------------------------------------|---|
| FSAR Section 2.4.12 Developing Wells | May 3, 2007 – June 7, 2007 | By Boart Longyear/Prosonic under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Boart Longyear determined to be acceptable sub-contractor per B&V procedures on May 1, 2007. Data Collection Plan (DCP), Work Plan (WP) and Specification developed per B&V Procedures. B&V maintained field oversight during drilling operations. Surveillance of on-site hydrogeology activities performed, May 31, 2007. | April 23, 2007 (DCP and WP approval) | Note 2 |
| FSAR Section 2.4.12 Field Permeability Tests | May 21, 2007 – June 28, 2007 | By Boart Longyear/Prosonic under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Boart Longyear determined to be acceptable sub-contractor per B&V procedures on May 1, 2007. Data Collection Plan (DCP), Work Plan (WP) and Specification developed per B&V Procedures. Testing performed per DCP and WP under B&V direction. | April 23, 2007 (DCP and WP approval) | Note 2 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 9 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|--|----------------------------|--|
| FSAR Section 2.4.12 Water Analytical Analysis | August 1, 2007 – March 12, 2008 | By PSI under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | PSI qualified as a commercial grade supplier per B&V procedures, April 25, 2007. Surveillance of laboratory activities performed, September 21, 2007. Water analytical testing performed per PSI procedures. Laboratory report reviewed by B&V | March 12, 2008 | Note 2 |
| FSAR Section 2.4.13 Section Development | May 2, 2008 – May 23, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | May 23, 2008 | Initial Review/Acceptance May 23, 2008 – June 30, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.4.14 Section Development | April 21, 2008 – April 28, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 28, 2008 | Initial Review/Acceptance April 29, 2008 – June 10, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 10 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.5.1 Section Development | November 28, 2007 – April 4, 2008 | By B&V and Geomatrix under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Geomatrix qualified per B&V procedures, July 3, 2007. B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | April 4, 2008 | Initial Review/Acceptance April 4, 2008 – June 26, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 2.5.2 Section Development | December 13, 2007 – June 12, 2008 | By Geomatrix under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Geomatrix qualified per B&V procedures, July 3, 2007. B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | June 12, 2008 | Initial Review/Acceptance June 12, 2008 – July 31, 2008 Final Review/Acceptance July 3, 2008 - September 16, 2008 |
| FSAR Section 2.5.3 Section Development | December 13, 2007 – May 6, 2008 | By Geomatrix under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Geomatrix qualified per B&V procedures, July 3, 2007. B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | May 6, 2008 | Initial Review/Acceptance May 6, 2008 – July 3, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 11 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.5.4 Section Development | December 13, 2007 – May 6, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | May 6, 2008 | Initial Review/Acceptance May 6, 2008 – July 8, 2008 Final Review/Acceptance July 3, 2008 - September 16, 2008 |
| FSAR Section 2.5.5 Section Development | December 13, 2007 – May 6, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | May 6, 2008 | Initial Review/Acceptance May 6, 2008 – July 8, 2008 Final Review/Acceptance July 3, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 12 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|--|---|
| FSAR Section 2.5 Boring Operations | June 12, 2007 – September 21, 2007 | By Boart Longyear/Prosonic under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Boart Longyear determined to be acceptable sub-contractor per B&V procedures on May 1, 2007 Data Collection Plan (DCP), Work Plan (WP) and Specification developed per B&V Procedures. B&V maintained field oversight during drilling operations. Surveillance of on-site hydrogeology and geotechnical activities performed, May 31, 2007, September 19, 2007, and December 5, 2007. | Various dates tied to revisions to DCP and WP. | Note 2 |
| FSAR Section 2.5 Geotechnical Laboratory Analysis | June 4, 2007 – July 2, 2008 | By PSI under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | PSI qualified as a commercial grade supplier per B&V procedures, April 25, 2007. Surveillance of laboratory activities performed, September 21, 2007. Geotechnical laboratory testing performed per PSI procedures. Laboratory report reviewed by B&V | July 2, 2008 | Note 2 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 13 of 18) [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|---|
| FSAR Section 2.5 Geotechnical Laboratory Analysis | April 22, 2008 - July 25, 2008 | By Kleinfelder under the PSI Quality Assurance Program under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Kleinfelder qualified as a sub-contractor to PSI. Analytical testing performed per Kleinfelder test plan, reviewed by B&V. Laboratory report reviewed by B&V | July 25, 2008 | Note 2 |
| FSAR Section 2.5 Field Geotechnical Testing | July 10, 2007 - June 16, 2008 | By ARM Geophysics under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | ARM qualified per B&V procedures, June 29, 2007 Field testing performed in accordance with ARM procedures. Geophysical well logging report reviewed by B&V. | June 16, 2008 | Note 2 |
| FSAR Section 2.5 Field Geotechnical Testing | September 12, 2007 - March 14, 2008 | By GEOVision under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | GEOVision qualified per B&V procedures, June 27, 2007 Field testing performed in accordance with GEOVision procedures, reviewed by B&V. Geophysical testing report reviewed by B&V. | March 14, 2008 | Note 2 |
| FSAR Section 2.5 Field Geotechnical Testing | September 14, 2007 - January 25, 2008 | By In Situ Engineering under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | Field testing performed in accordance with In Situ Engineering Technical Specification, reviewed by B&V. Geophysical testing report reviewed by B&V. | January 25, 2008 | Note 2 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 14 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|--|--|--|---|---|----------------------------|---|
| FSAR Chapter 3 Section Development | December 10, 2007 – January 25, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | January 25, 2008 | Initial Review/Acceptance February 6, 2008 – June 30, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Chapter 4 Section Development | November 5, 2007 – December 14, 2007 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | December 14, 2007 | February 6, 2008 – April 21, 2008 |
| FSAR Chapter 5 Section Development | January 14, 2008 – January 25, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | January 25, 2008 | Initial Review/Acceptance February 6, 2008 – April 4, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Chapter 6 (Excluding Section 6.4) Section Development | January 10, 2008 – February 6, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | February 6, 2008 | Initial Review/Acceptance February 6, 2008 – April 8, 2008 Final Review/Acceptance July 3, 2008 – August 15, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 15 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|--|----------------------------|---|
| FSAR Section 6.4 Section Development | April 28, 2008 – May 30, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. (RFR-0262) Calculations verified per Nuclear Procedures. Section validated per B&V Project Instructions. | May 30, 2008 | Initial Review/Acceptance May 30, 2008 – July 22, 2008 Final Review/Acceptance July 3, 2008 – August 15, 2008. |
| FSAR Chapter 7 Section Development | November 9, 2007 – December 14, 2007 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | December 14, 2007 | February 6, 2008 – February 27, 2008 |
| FSAR Chapter 8 Section Development | January 14, 2008 – May 23, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | May 23, 2008 | Initial Review/Acceptance May 23, 2008 – July 21, 2008 Final Review/Acceptance July 3, 2008 – August 15, 2008 |
| FSAR Section 9.1 Section Development | March 17, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance August 15, 2008 – September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 16 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|--|--|--|---|---|----------------------------|---|
| FSAR Section 9.2 (Excluding Section 9.2.3) Section Development | January 31, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance June 3, 2008 - September 16, 2008 |
| FSAR Section 9.2.3 Section Development | March 14, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |
| FSAR Section 9.3 Section Development | March 18, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance August 15, 2008 - September 16, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 17 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|--|
| FSAR Section 9.4 Section Development | March 18, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance June 3, 2008 - September 16, 2008 |
| FSAR Section 9.5 Section Development | January 14, 2008 – April 10, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | April 10, 2008 | Initial Review/Acceptance April 11, 2008 – July 1, 2008 Final Review/Acceptance June 3, 2008 - September 16, 2008 |
| FSAR Chapter 14 Section Development | January 16, 2008 – February 8, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | February 8, 2008 | Initial Review/Acceptance February 8, 2008 – June 30, 2008 Final Review/Acceptance July 3, 2008 – September 16, 2008 |
| FSAR Chapter 15 Section Development | November 11, 2007 – December 14, 2007 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | December 14, 2007 | February 6, 2008 – July 22, 2008 |

Table 17.5-201 Quality Assurance Activities for FSAR Section and Supporting Activities (Sheet 18 of 18) → [EF3 COL 12.2-2.A]

| COLA Section and Supporting Activity(ies) | Date of the Section Creation or Activity | Organization Creating and Governing QAPD | QA organization Responsible for Oversight | Dates and Type of any Specific Contractor QA Oversight Activities (i.e. Surveillance, document review, etc) | Contractor's Approval Date | Date of Detroit Edison Review and Acceptance (see Note 1) |
|---|--|--|---|---|----------------------------|--|
| FSAR Chapter 16 Section Development | May 9, 2008 – May 21, 2008 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | May 21, 2008 | Initial Review/Acceptance May 21, 2008 – July 8, 2008 Final Review/Acceptance July 3, 2008 – September 16, 2008 |
| FSAR Chapter 18 Section Development | October 16, 2007 – December 14, 2007 | By B&V under the B&V Nuclear Organization Quality Assurance Manual, Revisions 2 and 3. | B&V QA | B&V review performed per Nuclear Procedures and Project Process Instructions. Section validated per B&V Project Instructions. | December 14, 2007 | February 6, 2008 – February 27, 2008 |
| Notes | | | | | | |
| <p>1) Detroit Edison reviewed FSAR chapters and sections as prescribed by Standard Work Instruction (SWI) –03-001-001-0529, "COLA Section and Chapter Review and Acceptance Process." SWI-03-001-001- 0529 prescribed that Nuclear Development staff were to confirm that COLA products prepared by B&V would be acceptable by the NRC. SWI-03-001-001-0529 noted that COLA preparation remained the responsibility of B&V.</p> <p>2) COLA intermediary work product produced by activities to support COLA section development was not directly reviewed by Detroit Edison. Detroit Edison reviewed the presentation of the information or result from this activity by reviewing incorporation of the information or result from this activity in the COLA section identified above (see Column 7).</p> | | | | | | |

Attachment 3
NRC3-11-0035
(5 pages)

Supplemental Response to RAI Letter No. 64
(eRAI Tracking No. 5905)

RAI Question No. 09.02.04-1

NRC RAI 09.02.04-1

10 CFR 50 Appendix A, Criterion 2 states that structures, systems, and component (SSCs) important to safety shall be designed to withstand the effects of natural phenomena such as earthquakes and floods.

10 CFR 50 Appendix A, Criterion 4 states that SSCs important to safety shall be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operations, maintenance, testing, and postulated accidents.

ESBWR Design Control Document (DCD) Revision 9, Table 3.2-1, "Classification Summary," describes the potable water and sanitary waste system (U42) as being seismic category NS and located in the reactor building, service building, control building, electrical building, outdoors onsite, turbine building, and any other location.

ESBWR DCD Revision 9, Section 3.4.1 "Flood Protection," does not specifically account for or credit the flooding analysis including the U42 system.

ESBWR DCD Revision 9, Section 9.2.4, "Potable and Sanitary Water System," describes the U42 system as conceptual design and will be replaced with site-specific design information in the COLA FSAR.

Fermi 3 COL FSAR, Revision 3, Section 3.4, "Water Level (Flood) Design," states the there are no departures or supplements.

Fermi 3 COL FSAR, Revision 3, Section 9.2.4, "Potable and Sanitary Water System," describes the potable water system (PWS) and sanitary water discharge system (SWDS) and that failure of the system does not compromise any safety-related equipment or component and does not prevent safe shutdown of the plant. In addition, Table 9.2-203, "Potable Water System Component Design Characteristics (CDI)," states that the potable water storage tank is 75.7 m³ (20,000 gallons). Specifically, the applicant should address in the COL FSAR the following with respect to the potable and sanitary water system:

- 1. The exact location of the potable water storage tank with respect to building or yard location.*
- 2. Discussion of the potable water storage tank and any bounding flooding analysis in Sections 3.4 and 9.2.4 of the COL FSAR and any effects on safety related SSCs. If the tank is located in the yard, discuss the site grading around the tank and direction of water away from safety related SSCs.*
- 3. Discussion of this potable water storage tank and any bounding flooding analysis in Sections 3.4 and 9.2.4 of the COL FSAR and any effects on the non-safety related SSCs that are designated as "Regulatory Treatment of Nonsafety-Related Systems" (RTNSS) SSCs. If the tank is located in the yard, discuss the site grading around the tank and direction of water away from RTNSS SSCs.*
- 4. Discussion in Section 9.2.4 of the PWS and SWDS, specifically the potable water storage tank, related to GDC 2.*
- 5. Discussion in Section 9.2.4 of the PWS and SWDS, specifically the potable water storage tank, related to GDC 4 as it related to discharging fluids which may result from PWS and SWDS equipment failures.*

Supplemental Response

Detroit Edison provided a response to NRC RAI 09.02.04-1 (eRAI Tracking No. 5905) in Detroit Edison letter NRC3-10-0031, dated August 12, 2011 (ML11228A127), which described the location of the potable water storage tank and discussed the potential failure of the potable water storage tank and the impacts on safety related and Regulatory Treatment of Nonsafety-Related Systems (RTNSS) Structures, Systems, or Components (SSCs).

As discussed in a conference call with the NRC on August 18, 2011, the following text from the initial response to RAI 09.02.04-1 will be incorporated into FSAR Section 9.2.4.3 as shown on the attached markup:

Failure of the potable water storage tank would not adversely impact any safety-related or Regulatory Treatment of Nonsafety-Related Systems (RTNSS) Structures, Systems, or Components (SSCs); therefore, those safety-related and RTNSS SSCs satisfy 10 CFR 50 Appendix A Criteria 2 and 4.

Proposed COLA Revision

FSAR Section 9.2.4.3 is revised as shown on the attached markup.

Markup of Detroit Edison COLA
(following 1 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in the next submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

Analysis of routine Septic Tank grab samples will detect events that might contaminate the SWDS down stream of the Septic Tank. This provides the action required by Inspection and Enforcement Bulletin No. 80-10.

9.2.4.3 Safety Evaluation

Potable Water System

The PWS has no safety-related function and is not connected to any safety-related structure, system or component. Failure of the system does not compromise any safety-related equipment or component and does not prevent safe shutdown of the plant. The PWS does not handle radioactive fluids. It is neither connected to, nor does it interface with any system that may contain radioactive fluids.

Sanitary Waste Discharge System

Failure of the potable water storage tank would not adversely impact any safety-related or Regulatory Treatment of Nonsafety-Related Systems (RTNSS) Structures, Systems, or Components (SSCs); therefore, those safety-related and RTNSS SSCs satisfy 10 CFR 50 Appendix A Criteria 2 and 4.

tion and is not connected to any
Failure of the system does not
nent or component and does not

radioactive fluids. It is neither connected to, nor does it interface with, any system that may contain radioactive fluids. SWDS effluent is monitored as described in Table 11.5-201. In the event radioactivity is detected above predetermined limits, controls are in place to prevent offsite disposal of sewage sludge prior to on-site evaluation of potential radiological contamination and treatment when contamination is beyond acceptable limits.

9.2.4.4 Testing and Inspection Requirements

The PWS and SWDS are proven operable by their use during normal plant operation.

9.2.4.5 Instrumentation Application

The PWS and SWDS are furnished with instrumentation that permit local and/or remote monitoring and control of each of the respective processes. This instrumentation includes meters, switches, indicators, pressure gauges, flow switches, transmitters, controllers, and valves as required for service, operation, and protection of plant personnel and equipment.