



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 27, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALLS HELD ON MARCH 6, 2015  
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE  
ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL  
INFORMATION PERTAINING TO THE FERMI 2 LICENSE RENEWAL  
APPLICATION (TAC NO. MF4222)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or the applicant) held three telephone conference calls on March 6, 2015, to discuss and clarify the staff's draft requests for additional information (DRAIs) B.1.16-2a and B.1.22-2a, and the applicant's response to requests for additional information (RAIs) 2.4.4-2, 3.3.2.9-1, and B.1.22-1 concerning the Fermi 2 license renewal application. The telephone conference calls were useful in clarifying the intent of the staff's DRAIs and the applicant's responses.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the DRAIs and RAI responses discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

**/RA/**

Daneira Meléndez-Colón, Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures:

1. List of Participants
2. Summary of Telephone  
Conference Call

cc w/encls: Listserv

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ADAMS Accession No.: ML15072A203

\*Concurred via e-mail

OFFICE	LA:RPB1:DLR	PM:RPB1:DLR	PM:RPB1:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	*YEdmonds	DMeléndez-Colón	JDaily	YDiaz-Sanabria	DMeléndez-Colón
DATE	4/ 14 /15	4/16/15	4/17/15	4/24/15	4/27/15

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D. Melendez-Colon

Y. Diaz-Sanabria

E. Keegan

B. Wittick

B. Harris, OGC

D. Roth, OGC

M. Kunowski, RIII

B. Kemker, RIII

V. Mitlyng, RIII

P. Chandrathil, RIII

TELEPHONE CONFERENCE CALL  
FERMI 2  
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS  
MARCH 6, 2015

PARTICIPANTS

AFFILIATIONS

Daneira Meléndez-Colón	U. S. Nuclear Regulatory Commission (NRC)
Naeem Iqbal	NRC
Christopher Hovanec	NRC
Samuel Cuadrado De Jesús	NRC
Angela Buford	NRC
Lynne Goodman	DTE Electric Company (DTE)
Kevin Lynn	DTE
John Tibai	DTE
Chris Redmond	DTE
Brett Gallatin	DTE
Al Brooks	DTE

SUMMARY OF TELEPHONE CONFERENCE CALL  
FERMI 2  
LICENSE RENEWAL APPLICATION  
MARCH 6, 2015

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or the applicant) held three telephone conference calls on March 6, 2015, to discuss and clarify the following draft requests for additional information (DRAIs) and request for additional information (RAI) responses concerning the Fermi 2 license renewal application (LRA).

**RAI 2.4.4-2**

Background:

By letter dated January 15, 2015, the applicant provided its response to RAI 2.4.4-2 (available through the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession Number ML15016A063). The staff requested clarification on the applicant's response.

Discussion:

Based on the discussion with the applicant, the staff indicated that the response to this RAI requires clarification. Specifically, it is not clear to the staff that the fire dampers assemblies addressed in the response are those in walls, ceilings, and floors. The applicant stated that the fire dampers assemblies addressed in the response are those in walls, ceilings, and floors. The applicant agreed to revise the response to this RAI and re-submit for the staff's review.

**DRAI B.1.16-2a**

Background:

The response to RAI B.1.16-2, dated January 28, 2015, states that the External Surfaces Monitoring Program will be revised to inspect insulated components to ensure that moisture intrusion has not degraded the insulation when the insulation is required to reduce heat transfer. Commitment No. 11h and Enhancement No. 8 were added to revise the program procedures to include instructions for the inspection of both jacketed and non-jacketed insulation for insulation degradation due to moisture intrusion.

Generic Aging Lessons Learned (GALL) Report Aging Management Program (AMP) XI.M36, as revised by License Renewal Interim Staff Guidance (LR-ISG)-2012-02, "Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation," provides guidance on the inspection of jacketed insulation to manage reduced heat transfer. The "detection of aging effects" program element states that if configuration features, such as minimum overlap and seam locations, associated with jacketed insulation are not applicable that an alternative inspection methodology should be proposed to address reduced thermal insulation resistance.

ENCLOSURE 2

Issue:

The staff lacks the information necessary to evaluate the aging management of reduced thermal insulation resistance of non-jacketed insulation. The External Surfaces Monitoring Program does not include an inspection methodology or frequency to detect reduced thermal insulation resistance due to moisture intrusion for non-jacketed insulation.

Request:

Provide the inspection methodology and frequency used to manage reduced thermal insulation resistance for non-jacketed insulation. State the basis for the inspection methodology and frequency.

Discussion:

The staff provided clarification related to its request in draft RAI B.1.16-2a.

The applicant understands the staff's concerns and will provide a response to the RAI.

This question will be sent as a formal RAI.

**DRAI B.1.22-2a**

Background:

By letter dated December 19, 2014, the staff issued RAI B.1.22-2 requesting DTE to describe how the Inservice Inspection - IWF Program will continue to be effective when corrective actions are not required per the American Society of Mechanical Engineers (ASME) Code, Section XI, Subsection IWF-2430, but a component in the IWF inspection sample is re-worked such that it no longer represents age-related degradation of the entire population. In response to RAI B.1.22-2 dated January 20, 2015, DTE stated, in part, the following:

Correction of some conditions over the life of the plant is expected but will not impair the ability of the IWF Program to manage the effects of aging. Modifying the program to add new component locations when a condition has been addressed is not necessary. This is because the aging mechanisms will likely be caused by local environment or operational conditions such as vibration or humidity. The programmatic requirements for sample expansion or extent of condition will address that. The Code sample population size is large enough that correction of some conditions will not prevent the program from adequately managing the effects of aging.

Issue:

NUREG-1800, Revision 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), Appendix A.1, recommends that when sampling is used to represent a larger population of components the sample should be based on aspects such as similarity of material, environment, and specific aging effect. The staff concern is that re-worked to as new condition IWF components are no longer representative of the specific age-related degradation of those IWF components in the population that are not in the inspection sample.

Request:

Explain how the Inservice Inspection - IWF Program will ensure that the inspection sample will adequately represent the age-related degradation of the IWF component population when components that are part of the sample are re-worked and no longer represent the age-related degradation of the remaining population.

Discussion:

The staff provided clarification related to its request in draft RAI B.1.22-2a

The applicant understands the staff's concerns and will provide a response to the RAI.

This question will be sent as a formal RAI.

**RAI 3.3.2.9-1**

Background:

By letter dated February 12, 2015, the applicant provided its response to RAI 3.3.2.9-1 (NRC's ADAMS Accession Number ML15045A007). The staff requested clarification on the applicant's response.

Discussion:

The staff asked for clarification on whether the bolts are always exposed to lube oil. It is not clear whether the referenced bolts in a lube oil (exterior) environment are entirely submerged in lube oil, or if there is the possibility that the bolts are sometimes exposed to moisture. The basis for the staff's concern is that for the bolts that will not be directly inspected, whether there may be a risk for a potentially corrosive environment if the bolting is occasionally exposed to moisture. The staff needs this information in consideration of the fact that the program does not include periodic visual inspections to detect the loss of material and loss of preload for submerged bolted connections.

The staff also asked the applicant to clarify how often the heating, ventilation, and air conditioning (HVAC) and combustion turbine generator (CTG) lube oil pumps pressure are checked and if preventive maintenance is performed for the CTG lube oil pumps.

The applicant stated that the bolts are always exposed to lube oil other than during maintenance. The applicant also stated that for the HVAC system the lube oil pump for the operating division (there are two divisions with one normally running and the other normally shutdown) runs all the time and the pressure is checked during startup and on a daily basis at least once per shift (i.e., approximately once every 12 hours). The preventive maintenance for these pumps is done once every 8 years. For the CTG, the lube oil pump runs only when needed. However, the pump is tested monthly (lube oil pressure is checked). The applicant further stated that no periodic preventive maintenance is done for this pump and that the pump will shut down if the lube oil pressure drops.

The staff will continue its review of the response based on the clarification provided by the applicant.

#### **RAI B.1.22-1**

##### Background:

By letter dated February 19, 2015, the applicant provided its response to RAI B.1.22-1 (NRC's ADAMS Accession Number ML15050A602). The staff requested clarification on the applicant's response.

##### Discussion:

The staff asked whether the applicant inspects the drywell bioshield annulus to make sure that it is kept dry. The applicant stated that the drywell bioshield annulus is inspected every outage and that the only time the high-strength bolts are exposed to water is when they perform UT (ultrasonic testing) of the reactor pressure vessel shell welds during the refueling outages. During the UT the high-strength bolts are exposed to water for several days but the water temperature is approximately 70 to 80 degrees Fahrenheit which is considered a low temperature. The applicant clarified that the water is removed after the UT test.

The staff will continue its review of the response based on the clarification provided by the applicant.