

NRR-PMDAPEm Resource

From: Green, Kimberly
Sent: Monday, July 06, 2015 2:42 PM
To: Alan I Hassoun
Cc: Rankin, Jennivine; Aragon, Oscar; Johnson, Don; Anderson, Joseph; Norris, Michael
Subject: Follow-Up Request for Additional Information Regarding EAL Scheme Change LAR (MF5048)
Attachments: Fermi 2 EAL follow up RAIs.docx

Mr. Hassoun,

By letter dated October 21, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14295A078), DTE Electric Company (DTE) submitted a license amendment request to the Fermi 2 Facility Operating License (NPF-43). The proposed amendment revises the current emergency action level (EAL) scheme from one base upon NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels," to one based upon the Nuclear Energy Institute (NEI) document NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors" (ADAMS Accession No. ML13091A209).

By email dated May 6, 2015 (ADAMS Accession No. ML15127A212), the U.S. Nuclear Regulatory Commission (NRC) requested additional information to complete its review of the license amendment request (LAR). By letter dated June 18, 2015 (ADAMS Accession No. ML15170A324), DTE responded to the staff's request.

The NRC staff has reviewed the information provided in the license amendment request and response to the request for additional information and has determined that additional information is needed in order to complete its review. Please see the attached file for the follow-up request for additional information.

As agreed to in a call with you today, please provide a response the request no later than July 31, 2015. If a response cannot be provided by this date, please let Ms. Jennivine Rankin know as soon as possible.

Thanks,
Kimberly Green
(301) 415-1627
kimberly.green@nrc.gov

Hearing Identifier: NRR_PMDA
Email Number: 2213

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Subject: Follow-Up Request for Additional Information Regarding EAL Scheme Change
LAR (MF5048)
Sent Date: 7/6/2015 2:42:00 PM
Received Date: 7/6/2015 2:41:00 PM
From: Green, Kimberly

Created By: Kimberly.Green@nrc.gov

Recipients:

"Rankin, Jennivine" <Jennivine.Rankin@nrc.gov>
Tracking Status: None
"Aragon, Oscar" <Oscar.Aragon@nrc.gov>
Tracking Status: None
"Johnson, Don" <Don.Johnson@nrc.gov>
Tracking Status: None
"Anderson, Joseph" <Joseph.Anderson@nrc.gov>
Tracking Status: None
"Norris, Michael" <Michael.Norris@nrc.gov>
Tracking Status: None
"Alan I Hassoun" <hassouna@dteenergy.com>
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	1582	7/6/2015 2:41:00 PM
Fermi 2 EAL follow up RAls.docx		23546

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

REQUEST FOR ADDITIONAL INFORMATION
DTE ELECTRIC COMPANY
FERMI UNIT 2
LICENSE AMENDMENT REQUEST TO
REVISE THE EMERGENCY ACTION LEVEL SCHEME
DOCKET NO. 50-341

By letter dated October 21, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14295A078), DTE Electric Company (DTE) submitted a license amendment request to the Fermi 2 Facility Operating License (NPF-43). The proposed amendment revises their current emergency action level (EAL) scheme from one based upon NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels," to one based upon the Nuclear Energy Institute (NEI) document NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors" (ADAMS Accession No. ML13091A209).

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The NRC staff has reviewed the information provided in the license amendment request and response to the request for additional information (RAI) and has determined that additional information is needed in order to complete its review.

1. Follow-up to RAI #4 Response: DTE states that it has changed the established set of Max Safe instrumentation/values with an alternate table with appropriate threshold values. This did not appear to have changed with EALs CG1.1 and CG1.2. Please explain this apparent discrepancy or revise the values used for Max Safe radiation levels consistently throughout the entire EAL scheme.
2. Follow-up to RAI #4 and #29 Responses: The newly-developed Table F-2 uses instrumentation values that are significantly below the guidance of Max Safe radiation levels referenced in NEI 99-01, Revision 6. While EOP Table 14 lists all Max Safe levels at 5 R/hr, Table F-2 lists the EAL threshold values as 950 mR/hr for all secondary containment radiation monitors with a maximum detector scale of 1 R/hr, and does not address the omission of the detectors with a maximum scale of 100mr/hr. As proposed, DTE could potentially be declaring a General Emergency when secondary containment radiation levels are approximately 20% of the approved guidance's threshold value, resulting in a significant event over-classification and unwarranted protective actions being recommended for the general public. For all instances of Max Safe radiation values, please provide an adequate indication of Containment Challenge or Primary Containment Isolation Failure, as appropriate, with justification of how these indications are appropriate for the EAL scheme and meet the intent of the approved guidance.

3. Follow-up to RAI #6 Response: DTE did not address the question regarding the difference between the currently-approved radiation level threshold values and the values included in the LAR, especially considering the guidance for these EALs is the same in their current scheme and in NEI 99-01, Revision 6. Please explain the difference between the currently-approved radiation level threshold values and the values included in the LAR and provide justification why the currently-used EAL threshold values are appropriate for the approved scheme.
4. Based on the responses to the questions above, please provide a complete and clean (i.e., no markups) copy of your final EAL Basis Document.