

DTE Energy
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DTE Energy



10 CFR 52.3

April 29, 2016
NRC3-16-0003

Dr. Jennifer Uhle, Director
Office of New Reactors
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

- References:
- 1) Fermi 3
NRC Docket No. 52-033
NRC License No. NPF-95
 - 2) Letter from Peter W. Smith (Detroit Edison Company) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 39," NRC3-10-0036, dated September 2, 2010
 - 3) Letter from Peter W. Smith (Detroit Edison Company) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 43," NRC3-10-0053, dated November 8, 2010
 - 4) Letter from Peter W. Smith (Detroit Edison Company) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 63," NRC3-11-0030, dated August 16, 2011

Subject: DTE Electric Company Submittal of Schedule for Implementation of Fermi 3
Operational Programs and Other License Conditions

The U.S. Nuclear Regulatory Commission (NRC) issued Combined License (COL) NPF-95 to DTE Electric Company (DTE), pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Section 52.97, "Issuance of combined licenses," on May 1, 2015. License Condition 2.D.(11) of the Fermi 3 COL requires DTE to submit, no later than 12 months after issuance of the COL, the following:

- A schedule for implementation of the operational programs listed in Final Safety Analysis Report Table 13.4-201, including the associated estimated date for initial loading of fuel.

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- A schedule for implementation for the license conditions listed in COL Section 2.D.(11)(a) and (b).

The schedule for the implementation of operational programs and other license conditions is provided in the attachment to this letter. Since DTE has not yet made a decision to construct the Fermi 3 plant, there are no scheduled dates for the various implementation milestones listed, including the estimated date for initial loading of fuel. Therefore, the scheduled implementation dates for the operational programs are designated as "To Be Determined" (TBD). When DTE makes a decision to construct Fermi 3, a detailed schedule will be developed for the various milestones and implementation dates for the operational programs. In accordance with License Condition 2.D.(11), the attached schedule will be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until all of the operational programs have been fully implemented.

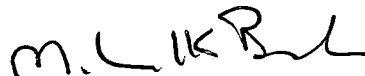
In the response to NRC Request for Additional Information (RAI) 13.06.01-51 contained in Reference 2, DTE committed to developing the site protective strategy as part of the implementation of the site Security Plan (Item 15 in Fermi 3 UFSAR Table 13.4-201). This specific activity is included in the overall implementation of the site Security Plan and is not separately included in this implementation schedule.

Similarly, in the responses to RAIs 19.03-14 and 19.03-27 in Reference 3, DTE committed to making arrangements for sharing of personnel and facilities, and coordination and training of personnel as part of implementation of the Mitigative Strategies Description and Plans (Item 21 in Fermi 3 UFSAR Table 13.4-201). These specific activities are included in the overall implementation of the Mitigative Strategies Description and Plans and are not separately included in this implementation schedule.

Finally, in response to RAI 13.03-38 in Reference 4, DTE committed to implementing a spent fuel rack coupon monitoring program in a proposed license condition. Inclusion of this program was modeled after the proposed license conditions for the Vogtle Units 3 and 4 COL Application that existed at that time. The Fermi 3 proposed license condition became License Condition 2.D.(11)(b) in the Fermi 3 COL. However, no implementation milestone was provided. Since the implementation milestone for the similar program in the Vogtle Units 3 and 4 COL is given as "before initial fuel load", the implementation milestone is listed as "Prior to Fuel Load" in the attached schedule.

If you have any questions, or need additional information, please contact me at (313) 235-0443.

Sincerely,



Michael K. Brandon, Manager
Nuclear Development – Licensing
DTE Electric Company

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Attachment: Schedule for Implementation of Fermi 3 Operational Programs and Other
License Conditions

cc: Adrian Muniz, NRC Fermi 3 Project Manager
Mallecia Sutton, NRC Fermi 3 Environmental Project Manager
Fermi 2 Resident Inspector
NRC Region III Regional Administrator
NRC Region II Regional Administrator
Supervisor, Electric Operators, Michigan Public Service Commission
Michigan Department of Environmental Quality
OWMRP, Radiological Protection Section
Regina A. Borsh, Dominion Energy, Inc.
Patricia L. Campbell, General Electric

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**Attachment to
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**Schedule for Implementation of Fermi 3 Operational Programs and Other License
Conditions**

(12 pages)

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 1	Inservice Inspection Program [UFSAR Sections 5.2.4, 6.6 and 3.8.1.7.3]	Prior to commercial service	TBD
Fermi 3 UFSAR Table 13.4-201 Item 1	Flow Accelerated Corrosion Program [UFSAR Section 6.6.7]	Prior to commercial service	TBD
Fermi 3 UFSAR Table 13.4-201 Item 2	Inservice Testing Program [UFSAR Section 3.9.6]	After generator online on nuclear heat	TBD
Fermi 3 UFSAR Table 13.4-201 Item 3	Environmental Qualification Program [UFSAR Section 3.11 and License Condition 2.D.(10)(a)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 4	Preservice Inspection Program [UFSAR Sections 5.2.4, 6.6 and 3.8.1.7.3]	Completion prior to initial plant startup	TBD
Fermi 3 UFSAR Table 13.4-201 Item 5	Reactor Vessel Material Surveillance Program [UFSAR Section 5.3.1 and License Condition 2.D.(10)(b)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 6	Preservice Testing Program [UFSAR Section 3.9.6 and License Condition 2.D.(10)(c)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 7	Containment Leakage Rate Testing Program [UFSAR Section 6.2.6 and License Condition 2.D.(10)(d)]	Prior to fuel load	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 8	Fire Protection Program [UFSAR Section 9.5.1.15, License Conditions 2.D.(10)(e) 2 and 3]	Prior to fuel receipt for elements of the Fire Protection Program necessary to support receipt and storage of fuel onsite	TBD
Fermi 3 UFSAR Table 13.4-201 Item 8	Fire Protection Program [UFSAR Section 9.5.1.15 and License Condition 2.D.(10)(e) 4]	Prior to fuel load for elements of the Fire Protection Program necessary to support fuel load and plant operation	TBD
Fermi 3 UFSAR Table 13.4-201 Item 8	Fire Protection Program (portions applicable to radioactive material) [UFSAR Section 9.5.1.15 and License Condition 2.D.(10)(e) 1]	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 9	Process and Effluent Monitoring and Sampling Program: Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls [UFSAR Section 11.5.4.6 and License Condition 2.D.(10)(f)]	Prior to fuel load	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 9	Process and Effluent Monitoring and Sampling Program: Offsite Dose Calculation Manual [UFSAR Sections 11.5.4.5 and 11.5.4.8, License Condition 2.D.(10)(g)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 9	Process and Effluent Monitoring and Sampling Program: Radiological Environmental Monitoring Program [UFSAR Section 11.5.4.5 and License Condition 2.D.(10)(h)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 9	Process and Effluent Monitoring and Sampling Program: Process Control Program [UFSAR Section 11.4.2.3 and License Condition 2.D.(10)(i)]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 10	Radiation Protection Program [UFSAR Section 12.5 and License Condition 2.D.(10)(j) 1]	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18) for those elements of the Radiation Protection (RP) Program necessary to support such receipt	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 10	Radiation Protection Program [UFSAR Section 12.5 and License Condition 2.D.(10)(j) 2]	Prior to fuel receipt for those elements of the RP Program necessary to support receipt and storage of fuel onsite	TBD
Fermi 3 UFSAR Table 13.4-201 Item 10	Radiation Protection Program [UFSAR Section 12.5 and License Condition 2.D.(10)(j) 3]	Prior to fuel load for those elements of the RP Program necessary to support fuel load and plant operation	TBD
Fermi 3 UFSAR Table 13.4-201 Item 10	Radiation Protection Program [UFSAR Section 12.5 and License Condition 2.D.(10)(j) 4]	Prior to first shipment of radioactive waste for those elements of the RP Program necessary to support shipment of radioactive waste	TBD
Fermi 3 UFSAR Table 13.4-201 Item 11	Non-Licensed Plant Staff Training Program [UFSAR Section 13.2.2]	18 months prior to scheduled fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 11	Non-Licensed Plant Staff Training Program (portions applicable to radioactive material) [UFSAR Section 13.2.2]	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 12	Reactor Operator Training Program [UFSAR Section 13.2.1]	18 months prior to scheduled fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 13	Reactor Operator Requalification Program [UFSAR Section 13.2]	Within 3 months after issuance of an operating license or the date the Commission makes the finding under 10 CFR 52.103(g)	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 14	Emergency Planning [UFSAR Section 13.3]	Full participation exercise conducted within 2 years prior to scheduled date for initial loading of fuel	TBD
Fermi 3 UFSAR Table 13.4-201 Item 14	Emergency Planning [UFSAR Section 13.3]	Onsite exercise conducted within 1 year prior to scheduled date for loading fuel	TBD
Fermi 3 UFSAR Table 13.4-201 Item 14	Emergency Planning [UFSAR Section 13.3]	Licensee's detailed implementing procedures for its emergency plan submitted at least 180 days prior to scheduled date for initial loading of fuel	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 14	Emergency Planning [UFSAR Section 13.3 and License Condition 2.D.(12)(c)]	The licensee shall submit a fully developed set of site-specific Emergency Action Levels (EALs) to the NRC in accordance with the NRC-endorsed version of NEI 07-01, Rev. 0, with no deviations. The EAL scheme shall have been discussed and agreed upon with State and local officials. The fully developed site-specific EAL scheme shall be submitted to the NRC at least 180 days before the date scheduled for initial fuel load as set forth in notification submitted in accordance with 10 CFR 52.103(a)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Physical Security Program [UFSAR Section 13.6]	Prior to fuel onsite (Protected Area)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Safeguards Contingency Program [UFSAR Section 13.6]	Prior to fuel onsite (Protected Area)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Training and Qualification Program [UFSAR Section 13.6]	Prior to fuel onsite (Protected Area)	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Cyber Security Plan [UFSAR Section 13.6]	Prior to fuel onsite (Protected Area)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Physical Security Program (applicable to special nuclear materials) [UFSAR Section 13.6 and License Condition 2.D.(10)(m)]	Prior to receipt of special nuclear materials	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Construction (Workers and First Line Supervisors) [UFSAR Section 13.7]	Prior to initiating 10 CFR 26 construction activities	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Construction (Management and Oversight Personnel) [UFSAR Section 13.7]	Prior to initiating 10 CFR 26 construction activities	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Security Personnel [UFSAR Section 13.7]	Prior to initiating 10 CFR 26 construction activities	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Security Personnel [UFSAR Section 13.7]	Prior to the earlier of: a. Receipt of special nuclear material in the form of fuel assemblies b. Establishment of a protected area, or c. 10 CFR 52.103(g) finding	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Fitness for Duty Program Personnel [UFSAR Section 13.7]	Prior to initiating 10 CFR 26 constriction activities	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Individuals Required to Physically to Report to the Technical Support Center or Emergency Operations Facility [UFSAR Section 13.7]	Prior to the conduct of the first full participation emergency preparedness exercise under 10 CFR 50, Appendix E, Section F.2.a	TBD
Fermi 3 UFSAR Table 13.4-201 Item 15	Security Program: Fitness for Duty Program for Operation [UFSAR Section 13.7]	Prior to the earlier of: a. Receipt of special nuclear material in the form of fuel assemblies b. Establishment of a protected area, or c. 10 CFR 52.103(g) finding	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 16	Quality Assurance Program – Operation [UFSAR Section 17.5]	30 days prior to scheduled date for initial loading of fuel	TBD
Fermi 3 UFSAR Table 13.4-201 Item 17	Maintenance Rule [UFSAR Section 17.6]	Prior to fuel load authorization per 10 CFR 52.103(g)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 19	Initial Test Program [UFSAR Section 14.2 and License Condition 2.D.(10)(k) 1]	60 days prior to the scheduled date of the first preoperational test for the Preoperational Test Program	TBD
Fermi 3 UFSAR Table 13.4-201 Item 19	Initial Test Program [UFSAR Section 14.2 and License Condition 2.D.(10)(k) 2]	60 days prior to the scheduled date of initial fuel loading for the Startup Test Program	TBD
Fermi 3 UFSAR Table 13.4-201 Item 20	Snubber Testing and Inspection Program: Preservice Inspection Program [UFSAR Section 3.9.3.7.1(3) e]	Completion prior to initial plant startup	TBD
Fermi 3 UFSAR Table 13.4-201 Item 20	Snubber Testing and Inspection Program: Inservice Inspection Program [UFSAR Section 3.9.3.7.1(3) e]	Prior to commercial service. Snubber inservice examination is initially performed not less than two months after attaining 5% reactor power operation and will be completed within 12 calendar months after attaining 5% reactor power.	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 20	Snubber Testing and Inspection Program: Inservice Testing Program [UFSAR Section 3.9.3.7.1(3) e]	After generation online on nuclear heat. Snubber inservice examination is initially performed not less than two months after attaining 5% reactor power operation and will be completed within 12 calendar months after attaining 5% reactor power.	TBD
Fermi 3 UFSAR Table 13.4-201 Item 20	Snubber Testing and Inspection Program: Preservice Thermal Movement Inspection [UFSAR Section 3.9.3.7.1(3) e]	During initial heatup and cooldown	TBD
Fermi 3 UFSAR Table 13.4-201 Item 20	Snubber Testing and Inspection Program: Preservice Testing Program [UFSAR Section 3.9.3.7.1(3) e]	Prior to fuel load	TBD
Fermi 3 UFSAR Table 13.4-201 Item 21	Mitigative Strategies Description and Plans [UFSAR Section 19.6]	Prior to fuel load authorization per 10 CFR 52.103(g)	TBD
Fermi 3 UFSAR Table 13.4-201 Item 22	Lifecycle Minimization of Contamination [UFSAR Section 12.3]	Prior to fuel load	TBD

Schedule for Implementation of Fermi 3 Operational Programs and Other License Conditions

Item	Description	Implementation Milestone	Scheduled Implementation Date
Fermi 3 UFSAR Table 13.4-201 Item 23	Special Nuclear Materials Material Control and Accounting Program [UFSAR Section 13.5.2.2.11 and License Condition 2.D.(10)(I)]	Prior to receipt of special nuclear materials	TBD
Fermi 3 Combined License License Condition 2.D.(11)(a)	Site Specific Severe Accident Management Guidance [UFSAR Section 1.5.1.1.1 and License Condition 2.D.(12)(g)]	Prior to fuel load	TBD
Fermi 3 Combined License License Condition 2.D.(11)(b)	Spent Fuel Rack Coupon Monitoring Program	Prior to fuel load	TBD