



DTE Energy[®]

Fermi Unit 2

**License Amendment Request Pre-submittal
Meeting**

24 Month Fuel Cycle Project

December 4, 2018



- Introduction *Scott Maglio*
- Meeting Objectives *Jason Haas*
- Fermi 24 Month Fuel Cycle Background *Jason Haas*
- LAR Overview *Jason Haas*
- Summary / Questions / Feedback *Jason Haas*

- Provide the NRC Staff with an overview of DTEs plans to transition to a 24 Month Fuel Cycle (24 MFC) and associated License Amendment Request (LAR)
 - Scope and content
 - Schedule
- Obtain NRC feedback
 - Content
 - Approval schedule
 - Lessons learned

- Fermi 2 has implemented Technical Specifications Task Force (TSTF) Traveler 425, Relocate Surveillance Frequencies to Licensee Control.
 - TSTF-425 relocated most surveillance frequencies to licensee control under the Surveillance Frequency Control Program (SFCP) defined by TS 5.5.15.
 - TSTF-425 was approved and implemented at Fermi prior to DTE plans to adopt a 24 MFC
- DTE Energy is requesting NRC approval of a 24 MFC license amendment based on GL 91-04 in lieu of the Surveillance Frequency Control Program (SFCP)

There are two main components to the 24 MFC transition:

1. Surveillance frequency changes from 18 to 24 months
 - DTE will be submitting a LAR for the Surveillance Requirement (SR) and test frequency changes
2. Fuel and Core Design
 - A separate LAR may be necessary to revise Safety Limit Minimum Critical Power Ratio (SLMCPR)
 - DTE intends to adopt TSTF-564, SLMCPR
 - DTE plans to implement remaining Fuel and Core Design changes in accordance with 10 CFR 50.59.
- DTE will continue to manage the inter-relationships between planned and submitted LARs

- Technical justification in accordance with GL 91-04
 - Document acceptability for Surveillance extensions
 - Leverage and build upon the proven and predictable basis for extending surveillance frequencies
- Impact and Changes to the TS
 - TS 5.5.15 Surveillance Frequency Control Program
 - A note permitting the one time use of GL 91-04 to revise surveillance frequencies governed by the SFCP
 - TS 5.5.7, Ventilation Filter Testing Program and TS 5.5.14, Control Room Envelope Habitability Program
 - Extend 18 month test frequencies not governed by the SFCP

5.5.15 Surveillance Frequency Control Program

This program provides controls for the Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with the NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

The one-time 24 Month Fuel Cycle related Surveillance Requirement Frequency changes approved by the NRC in License Amendment XXX are not subject to this provision. Subsequent changes are subject to the Surveillance Frequency Control Program.

- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

LAR Overview – Scope and Content

- Consistent with all other 24 MFC plants, DTE will use GL 91-04 to justify surveillance and test frequency changes.
 - The LAR will include the same content and technical justification as previous GL 91-04 based 24 MFC applications.
- All 31 BWRs with 24 MFC subsequently implemented SFCP.
- All operating BWRs have implemented SFCP.
- To date, no plant has used the SFCP to transition to 24 MFC.
- After approval, Fermi will be the same as all other BWRs with GL 91-04 based 24 month surveillance frequencies subsequently controlled by the SFCP.

GL 91-04 provides a proven and predictable basis for extending surveillance and test frequencies to support 24 MFC

- DTE plans to submit the 24 MFC LAR by Fall 2019
 - GL 91-04 will be used as the technical basis
 - The LAR will re-baseline 18 month SFCP SR frequencies to 24 months
 - The SFCP would continue to govern the re-baselined 24 month SR frequencies
 - The LAR leverages the extensive proven and predictable industry experience with GL 91-04
- DTE plans to implement 24 MFC in Fall 2021
- Questions?
- Feedback?