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DTE

September 26, 2019
NRC-19-0065

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

Fermi 2 Power Plant
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: DTE Commitment Regarding Containment Coatings

References:
1) NRC Letter to DTE, "Fermi Power Plant, Unit 2 – Design Basis Assurance Inspection (Teams); Inspection Report 05000341/2019012," dated July 29, 2019 (ML19211B289)
2) NRC Letter to DTE, "Issuance of Renewed Facility Operating License No. NPF-43 for Fermi Nuclear Power Plant, Unit 2 (CAC No. MF4222)," dated December 15, 2016 (ML16351A459)
3) DTE Letter to NRC, "Results of Inspections and Repairs of Primary Containment / Torus Coatings During First Refueling Outage," NRC-89-0191, dated October 31, 1989

In Reference 1, the NRC documented the results of the 2019 Design Basis Assurance Inspection (DBAI) for Fermi 2. During the DBAI, NRC inspectors determined that additional inspection by a Special Inspection Team was warranted regarding containment coating located in the submerged portion of the pressure suppression chamber, also referred to as the torus. As noted in Reference 1, the results of the Special Inspection on the containment coating will be documented in Inspection Report 05000341/2019050.

As part of DTE Electric (DTE) reviews performed during the DBAI and the Special Inspection, as well as to support continued safe operation of Fermi 2 throughout the period of extended operation approved in Reference 2, DTE has determined that all of the submerged portion of the torus (i.e. the wetted region of the torus) will be recoated during the next refueling outage. By recoating all of the submerged portion of the torus, including internal components that are not part of the pressure boundary, the full extent of the coating condition reviewed by the DBAI and the Special Inspection Team will be addressed. This recoating activity will also resolve the full extent of the coating condition as first described in Reference 3.

The following new commitment is being made in this submittal:

> DTE commits to mitigate the degraded coating in the submerged portion of the torus by removing all coating in the submerged portion of the torus, including torus internals, and applying a qualified coating capable of withstanding design basis accident conditions. This DTE commitment will be completed prior to resuming power operation following the next refueling outage. The next refueling outage will begin no later than April 30, 2020.

DTE has performed evaluations and analyses that demonstrate reasonable assurance that, prior to the completion of the above commitment, the containment coating will not adversely interfere with the operation of emergency core cooling system (ECCS) subsystems that would be relied upon to function in the unlikely event of an accident.

If DTE identifies new information that impacts the torus coating condition or results in changes to the planned recoating activity described above, DTE will notify the NRC promptly.

If, based on further analysis and subject to any necessary NRC approvals, DTE identifies an alternative means to mitigate the degraded coating in the submerged portion of the torus that can be completed in a timely manner, this commitment will be revised accordingly.

Should you have any questions or require additional information, please contact Mr. Jason R. Haas, Manager – Nuclear Licensing, at (734) 586-1769.

Sincerely,

P Fessler

Paul Fessler
Senior Vice President and CNO

cc: NRC Project Manager
NRC Resident Office
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Regional Administrator, Region III
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