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Edison

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April 26, 1994  
NRC-94-0027

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) Generic Letter (GL) 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993
  - 3) General Electric (GE) BWR Owner's Group Topical Report, NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," dated January 1994

Subject: Proposed Technical Specification Change (License Amendment) Relocation of Response Time Limit Tables

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed changes into the Plant Technical Specifications (TS). The proposed changes relocates response time limit tables from the TS to the Updated Final Safety Analysis Report (UFSAR). This modification is a line item TS improvement as described in Reference 2.

Detroit Edison has evaluated the proposed TS against the criteria of 10CFR50.92 and determined that no significant hazards consideration is involved. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed TS and concurs with the enclosed determinations. In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

Relocating the response time limit tables to the UFSAR will allow Fermi 2 to administratively control changes to these tables in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request. Furthermore, in concert with this TS change Detroit Edison plans to begin revising these response time limit tables in accordance with the provisions of 10CFR50.59 when

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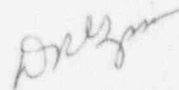
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the NRC issues the Safety Evaluation Report for the Licensing Topical Report, NEDO-32291 (Reference 3). This will result in significant improvements in plant safety as discussed in the evaluation section of Attachment 1 to this letter.

Consequently, the proposed change is being requested to coincide with the present refueling outage (RFO4) in order to enable us to take advantage of these benefits and improvements in plant safety and subsequent reductions in plant operating and maintenance costs immediately after NRC issuance of the Safety Evaluation Report for Reference 3. Therefore, Detroit Edison requests this change be approved by July 1, 1994.

If you have any questions, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,



Enclosure

cc: T. G. Colburn  
J. B. Martin  
M. P. Phillips  
K. R. Riemer  
Supervisor, Electric Operators, Michigan  
Public Service Commission - J. R. Padgett

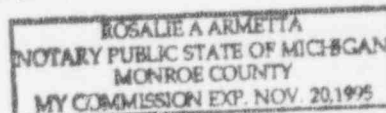
I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

*D.R. Gipson*

DOUGLAS R. GIPSON  
Senior Vice President

On this 26<sup>th</sup> day of April, 1994 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.

*Rosalie A. Armetta*  
Notary Public



ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE  
(LICENSE AMENDMENT)

RELOCATION OF RESPONSE TIME LIMIT TABLES

## INTRODUCTION

The Fermi 2 Technical Specifications (TS) contain limiting conditions for operations for Reactor Protection System (RPS) instrumentation, Isolation System instrumentation, and Emergency Core Cooling System (ECCS) Actuation instrumentation. These systems are required to be operable with response times as specified in the associated TS tables for each of these systems. The surveillance requirements (SR) specify that these systems be tested by verifying that the response time of each function is within its limits. Generic Letter 93-08 provides guidance for relocating the TS tables containing the various response time limits, to the Updated Final Safety Analysis Report (UFSAR).

The Fermi 2 plant procedures provide acceptance criteria for the response time limits currently identified in the TS tables. In accordance with Generic Letter 93-08, these procedures will continue to include, as applicable, acceptance criteria for the associated response time limit. Additionally, the Fermi 2 UFSAR will be modified to include the response time limits and associated footnotes. These changes will be submitted to the NRC during the next 10CFR50.71(e) update. The UFSAR will be modified to include information currently identified in TS Table 3.3.1-2, "REACTOR PROTECTION SYSTEM RESPONSE TIMES," Table 3.3.2-3, "ISOLATION ACTUATION SYSTEM INSTRUMENTATION RESPONSE TIME," and Table 3.3.3-3, "EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES." Also, the UFSAR will be modified to (1) include TS functions for those response time limits which are "not applicable" and (2) include descriptive information on how the response time limits are applied in lieu of the current TS footnotes. Subsequent changes to these limit tables would be subject to the provisions of 10CFR50.59 and 10CFR50.71(e), for changes to the UFSAR and to the provisions that control changes to plant procedures as denoted in TS Section 6.0, "Administrative Controls."

The proposed TS change allows Fermi 2 to administratively control changes to the response time limit tables for RPS, Isolation System, and ECCS in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request.

In the Fermi 2 TS, the Reactor Protection System Instrumentation specification corresponds to the reactor trip system specification discussed in Generic Letter 93-08 and the Isolation Actuation Instrumentation and the Emergency Core Cooling System Actuation Instrumentation specifications jointly correspond to the engineered safety features actuations system specification discussed in this Generic Letter.

In accordance with Generic Letter 93-08, the following changes to the TS are being proposed. The changes are described in the order in which the associated TS appears in the Technical Specifications.

## 1. TS INDEX

- a. The index is being revised to make editorial corrections to reflect the deletion of tables which contain response time limits as described below. The proposed TS page change is attached. It is prepared in accordance with the guidance in Reference 2.

## 2. REACTOR PROTECTION SYSTEM INSTRUMENTATION (3/4.3.1)

- a. Revised LCO 3.3.1 and SR 4.3.1.3 to delete reference to Table 3.3.1-2.

LCO 3.3.1 and SR 4.3.1.3 are proposed to be revised to delete the reference to Table 3.3.1-2 (Reactor Protection System Response Times). The referenced Table 3.3.1-2 is being deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. The reference to the Table is for information only and is not necessary to support the LCO or surveillance required by the TS.

- b. Revised SR 4.3.1.3 to denote the following:

"The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months. Neutron detectors are exempt from response time testing. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip system."

The proposed change is the addition of the statement "Neutron detectors are exempt from response time testing." This statement is currently included in Footnote \* in Table 3.3.1-2 and is being relocated to the SR consistent with the guidance provided in Generic Letter 93-08.

- c. Deleted Table 3.3.1-2, "REACTOR PROTECTION SYSTEM RESPONSE TIMES" and retain the page with the following: "Table 3.3.1-2 has been deleted."

Table 3.3.1-2, is proposed to be deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. Table 3.3.1-2 currently denotes functional units and response times associated with RPS. Relocation of the

response time limit table will not alter the associated SRs and is not necessary to support the actions required by the TS.

The proposed TS page changes are attached. They are written in accordance with the guidance in Reference 2.

### 3. ISOLATION ACTUATION INSTRUMENTATION (3/4.3.2)

- a. Revised LCO 3.3.2 and SR 4.3.2.3 to delete reference to Table 3.3.2-3.

LCO 3.3.2 and SR 4.3.2.3 are proposed to be revised to delete the reference to Table 3.3.2-3 (Isolation Actuation System Instrumentation Response Time). The referenced Table 3.3.2-3 is being deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. The reference to the Table is for information only and is not necessary to support the LCO or surveillance required by the TS.

- b. Revised SR 4.3.2.3 to denote the following:

"The ISOLATION SYSTEM RESPONSE TIME of each isolation trip function shall be demonstrated to be within its limit at least once per 18 months. Radiation detectors are exempt from response time testing. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific isolation trip system."

The proposed change is the addition of the statement "Radiation detectors are exempt from response time testing." This statement is currently included in Footnote (b) in Table 3.3.2-3 and is being relocated to the SR consistent with the guidance provided in Generic Letter 93-08.

- c. Deleted Table 3.3.2-3, "ISOLATION ACTUATION SYSTEM INSTRUMENTATION RESPONSE TIME" and retain both pages with the following: "Table 3.3.2-3 has been deleted."

Table 3.3.2-3 is proposed to be deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. Table 3.3.2-3 currently denotes trip functions and response times associated with the isolation system. Relocation of the response time limit table will not alter the associated SRs and is not necessary to support the actions required by the TS.

The proposed TS page changes are attached. They are written in accordance with the guidance in Reference 2.

#### 4. ECCS ACTUATION INSTRUMENTATION (3/4.3.3)

- a. Revised LCO 3.3.3 and SR 4.3.3.3 to delete reference to Table 3.3.3-3.

LCO 3.3.3 and SR 4.3.3.3 are proposed to be revised to delete the reference to Table 3.3.3-3 (Emergency Core Cooling System Response Times). The referenced Table 3.3.3-3 is being deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. The reference to the Table is for information only and is not necessary to support the LCO or surveillance required by the TS.

- b. Deleted Table 3.3.3-3, "EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES" and retain page with the following: "Table 3.3.3-3 has been deleted."

Table 3.3.3-3 is proposed to be deleted from the TS and relocated to the UFSAR consistent with Generic Letter 93-08. Table 3.3.3-3 currently denotes trip functions and response times associated with ECCS. Relocation of the response time limit table will not alter the associated SRs and is not necessary to support the actions required by the TS.

The proposed TS page changes are attached. They are written in accordance with the guidance in Reference 2.

#### EVALUATION

This proposal relocates the response time limit tables from the TS to the UFSAR. Relocating the response time limit tables to the UFSAR will allow Fermi 2 to administratively control changes to these tables in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request. This specific change, in itself, has no effect on the surveillance or system requirements and so, no effect on plant safety. Furthermore, in concert with this TS change Fermi 2 plans to begin revising these response time limit tables in accordance with the provisions of 10CFR50.59 when the NRC issues the Safety Evaluation Report for the Licensing Topical Report, NEDO-32291 (Reference 3). This will result in significant improvements in plant safety by: (1) minimizing the time when safety systems are out-of-service or otherwise incapable of responding to degraded plant conditions, (2) reducing the potential for inadvertent essential safety function actuations, (3) reducing the complexity of



refuel outages and thus reducing shutdown risk, (4) reducing personnel radiation exposure, and (5) allowing critical personnel to be used for other safety significant tasks. Additionally, this proposed TS change is a line-item TS improvement which is encouraged by Reference 2. Therefore, this TS change produces a net benefit to safety and is acceptable.

### **SIGNIFICANT HAZARDS CONSIDERATION**

In accordance with 10CFR50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards considerations. To make this determination, Detroit Edison must establish that operation in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed amendment will allow Fermi 2 to administratively control changes to the response time limit tables for RPS, Isolation System, and ECCS in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request. This modification is a line item TS improvement as described in Generic Letter 93-08 (Reference 2).

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes delete and subsequently relocate the details of Technical Specification Table 3.3.1-2, "REACTOR PROTECTION SYSTEM RESPONSE TIMES," Table 3.3.2-3, "ISOLATION ACTUATION SYSTEM INSTRUMENTATION RESPONSE TIME," and Table 3.3.3-3, "EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES," consistent with the guidance provided by Generic Letter 93-08 dated, December 29, 1993, entitled, "Relocation of Technical Specification Tables of Instrument Response Time Limits." Generic Letter 93-08 recommends the removal and subsequent relocation of various Technical Specification tables which denote instrument and system response time limits. The response time limits and associated footnotes are proposed to be relocated to the Fermi 2 Updated Final Safety Analysis Report (UFSAR). This allows Fermi 2 to administratively control subsequent changes to the response time limit tables in accordance with 10CFR50.59. The procedures which contain the various response time limits are also subject to the change control provisions in the Administrative Controls section of the Technical Specifications. The proposed change only relocates the existing response time limits. The Surveillance Requirements and associated Actions are not affected and remain in the Technical Specifications. Relocating this information does not affect the initial conditions of a design basis accident or transient analysis. Since any subsequent changes to the UFSAR or procedures are evaluated in accordance with 10CFR50.59, no increase in the probability or consequences of an accident previously evaluated is allowed. Further, the proposed

changes do not alter the design, function, or operation of the components involved and therefore, do not affect the consequences of any previously evaluated accident.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes will not impose any different operational or surveillance requirements. The changes propose to relocate these response time limit tables to other plant documents whereby adequate control of information is maintained. Further, as stated above, the proposed changes do not alter the design, function, or operation of the components involved and therefore, no new accident scenarios are created.
3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed change will not reduce a margin of safety because it has no impact on any safety analysis assumption. The proposed change does not alter the scope of equipment currently required to be OPERABLE or subject to surveillance testing nor does the proposed change affect any instrument setpoints or equipment safety functions. In addition, the values to be transposed from the Technical Specifications to the UFSAR are the same as the existing Technical Specifications. Since any future changes to these requirements in the UFSAR or procedures will be evaluated per the requirements of 10CFR50.59, no reduction in a margin of safety is allowed. Therefore, the change does not involve a significant reduction in a margin of safety.

### **ENVIRONMENTAL IMPACT**

Detroit Edison has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed Technical Specifications meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

### **CONCLUSION**

Based on the evaluations above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the proposed amendment will not be inimical to the common defense and security or the health and safety of the public.

In order to accomplish procedure changes associated with this change, Detroit Edison requests that the proposed license amendment be issued with a 60-day implementation period.