

Detroit  
Edison

B. Ralph Sylvia  
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March 26, 1990  
NRC-90-0033

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) NRC Generic Letter 89-14, "Line-item  
Improvements in Technical Specifications -  
Removal of the 3.25 Limit on Extending  
Surveillance Intervals," dated August 21, 1989
  - 3) NRC Generic Letter 87-09, "Section 3.0 and 4.0 of  
the Standard Technical Specifications (STS) on the  
Applicability of Limiting Conditions for Operation  
and Surveillance Requirements," dated June 4, 1987
  - 4) Detroit Edison Letter to NRC, NRC-88-0062,  
"Proposed Technical Specification (License  
Amendment) Change - Applicability (3/4.0),"  
dated May 24, 1988

Subject: Proposed Technical Specification Change (License  
Amendment) - Removal of the 3.25 Limit on Extending  
Surveillance Intervals

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. The proposed change eliminates the requirement in Technical Specification 4.0.2 that limits the combined time interval for any three consecutive surveillance intervals to less than 3.25 times the specified surveillance interval. This proposal follows the guidance of NRC Generic Letter 89-14 (Reference 2).

Detroit Edison has evaluated the proposed Technical Specifications 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 Technical Specifications and concurs with the

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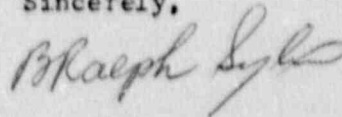
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enclosed determinations. In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

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

Sincerely,

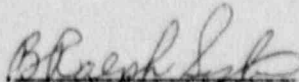


Enclosure

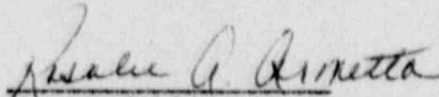
cc: A. B. Davis  
R. W. Defayette  
W. G. Rogers  
J. F. Stang  
Supervisor, Electric Operations, Michigan  
Public Service Commission

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I, B. RALPH SYLVIA, 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.

  
B. RALPH SYLVIA  
Senior Vice President

On this 26<sup>th</sup> day of March, 1990, before me personally appeared B. Ralph Sylvia, being first duly sworn and says that he executed the foregoing as his free act and deed.

  
Notary Public

ROSALIE A. ARMETTA  
Notary Public, Monroe County, MI  
My Commission Expires Jan. 11, 1992



## INTRODUCTION

Specification 4.0.2 of the Fermi 2 Technical Specifications (TS) permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillance to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

The NRC recently provided guidance for preparing license amendment requests to remove the 3.25 limit on extending surveillance intervals in Generic Letter 89-14. This submittal follows this guidance by proposing changes to Specification 4.0.2 and its corresponding Bases section which use the wording provided in the Generic Letter.

## EVALUATION

Generic Letter 89-14 provided the NRC staff's basis for the conclusion that the removal of the 3.25 limit on extending surveillance intervals will have an overall positive impact upon safety. This basis is as follows:

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25-percent allowance to extend a

surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the staff concluded that removal of the 3.25 limit will have an overall positive impact on safety.

Detroit Edison concurs in this evaluation and believes that these conclusions apply to Fermi 2. On this basis, the proposed changes, which follow the Generic Letter 89-14 guidance, are 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 changes eliminate the 3.25 limit on extending surveillance intervals. These changes do not involve a significant hazard because the operation of Fermi 2 in accordance with these changes would:

1. Not involve a significant increase in the probability or consequences of an accident previously evaluated because surveillance intervals will still be limited by the 25-percent allowance for each interval. Additionally, the 3.25 surveillance interval extension criteria was not considered in the plant accident analysis.
2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not add or modify any system design nor does it involve a change in operation of any plant system. The surveillance interval will continue to be constrained by the 25 percent interval extension criteria.
3. Not involve a significant reduction in a margin of safety because surveillance intervals will continue to be constrained by the 25-percent allowance, which provides allowable tolerances for performing surveillance requirements beyond those specified in the normal surveillance interval.

Based on the above, Detroit Edison has determined that the proposed amendment does not involve a significant hazards consideration.

#### ENVIRONMENTAL IMPACT

Detroit Edison has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. The proposed change does 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 do 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 evaluation 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 proposed amendments will not be inimical to the common defense and security or to the health and safety of the public.

Generic Letter 87-09 (Reference 3) provided to licensees new language for the Bases of TS 4.0.2. In Reference 4, Detroit Edison applied for the Generic Letter 87-09 changes. The Bases changes of Reference 4 have not yet been incorporated in the Fermi 2 TS. The Reference 4 Bases changes for TS 4.0.2 should not be incorporated when the Reference 4 proposal is approved if incorporation of the Bases change in this submittal has already taken place.