

B. Ralph Sylvia
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March 26, 1990
NRC-89-0299

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 88-16, "Removal of
Cycle-Specific Parameter Limits from
Technical Specifications,"
October 4, 1988
 - 3) "General Electric Standard Application
for Reactor Fuel, (GESTAR II),"
NEDE-24011-P-A and US Supplement,
Revision 9, September 1988
 - 4) Letter MFN-031-89/JSC-8952, J. S. Charnley
(GE) to M. W. Hodges (NRC), "Implementation
of Generic Letter 88-16," May 10, 1989
 - 5) Letter JSC-8981, J. S. Charnley (GE) to
M. W. Hodges (NRC), "Acceptance Implementation
of Generic Letter 88-16," August 8, 1989
 - 6) Letter NRC-89-0146, Detroit Edison to NRC,
"Supplement to Technical Specifications
Change (License Amendment) to Include Single
Recirculation Loop Operation (TAC No. 69074),"
August 18, 1989

Subject: Proposed Technical Specifications Change (License
Amendment) - Elimination of Cycle Specific Parameter
Limits

Pursuant to 10CFR50.90, Detroit Edison hereby proposes to amend
Operating License NPF-43 for the Fermi 2 plant by incorporating the
enclosed changes into the Plant Technical Specifications. The
proposal requests changes to the Technical Specifications related to
eliminating the cycle-specific parameter limits, listing the NRC
approved methods in the Technical Specifications, and describing the
Core Operating Limits Report (COLR) which will contain these

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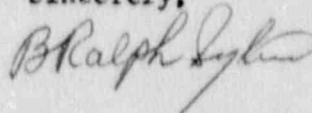
cycle-specific limits. These changes are consistent with the guidance provided in the NRC Generic Letter 88-16 (Reference 2) which encouraged all licensees and applicants to eliminate the cycle-specific limits from the Technical Specifications.

Attachment 1 provides the Summary, Description of Changes, Significant Hazards and Environmental Impact Considerations. Attachment 2 provides a summary listing of the proposed Technical Specification and Bases changes. Attachment 3 is a copy of the marked up Technical Specification and Bases pages. Enclosure 1 provides the Core Operating Limits Report for the Fermi 2 Plant, Cycle 2 which contains the cycle-specific parameter limits.

Detroit Edison has evaluated the proposed Technical Specifications against the criteria of 10CFR50.92 and has 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 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 in this matter, please contact Mr. Glen Ohlemacher at (313) 586-4275.

Sincerely,

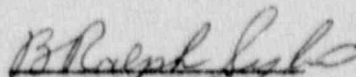


Enclosure

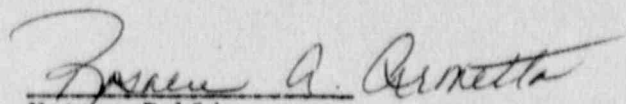
cc: A. B. Davis
R. W. DeFayette
W. G. Rogers
J. F. Stang
Supervisor, Electric Operators, Michigan
Public Service Commission - J. Padgett

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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 26th 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

ATTACHMENT 1

SUMMARY, DESCRIPTION OF
CHANGES, SIGNIFICANT HAZARDS
AND ENVIRONMENTAL IMPACT CONSIDERATIONS

INTRODUCTION

This proposed amendment incorporates the guidance provided by the NRC in Generic Letter 88-16 (Reference 2). The proposed amendment removes the values of cycle-specific parameter limits from Fermi 2 Technical Specifications and makes related administrative and format changes.

The Generic Letter 88-16 guidance was based on the NRC's review and approval of a lead-plant proposal for an alternative that eliminates the need for a license amendment to update the cycle-specific parameter limits at each fuel cycle. This request was submitted for the Oconee plant with the endorsement of the Babcock and Wilcox Owner's Group.

EVALUATION

The guidance of the Generic Letter 88-16 alternative consists of three separate actions to modify Fermi 2 Technical Specifications:

- (1) The addition of the definition (proposed Technical Specification 1.8) of a named formal report (CORE OPERATING LIMITS REPORT) which includes the values of the cycle-specific parameter limits that have been established using an NRC approved methodology and are consistent with the applicable limits of the safety analysis as addressed in the Fermi 2 Updated Final Safety Analysis Report (UFSAR).
- (2) The addition of an administrative reporting requirement (proposed Technical Specification 6.9.3) to submit the CORE OPERATING LIMITS REPORT to the Commission for information prior to use. The report is required to be based on the NRC-approved methodology outlined in GESTAR II (Reference 3). Reference in the proposed Technical Specification 6.9.3 is made to the analytical method previously reviewed and approved by the NRC in GESTAR II. No specific revision is listed. GESTAR II is frequently revised. This proposed wording will eliminate the need for frequent Technical Specification changes to update the reference to the proper GESTAR II revision. Since GESTAR II details the applicability of its methodology to each General Electric plant, the proposal ensures that only NRC approved methodology applicable to Fermi 2 is used. Reference to the revision of NEDE-24011-P-A (Reference 3) has been removed from the Bases section for consistency with the Technical Specification section. The COLR will specify the NRC approved version of GESTAR II utilized.

- (3) The modification of individual Technical Specifications to eliminate the cycle-specific parameter limits and to note that the cycle-specific parameters shall be maintained within the limits provided in the CORE OPERATING LIMITS REPORT.

The NRC has accepted the implementation of Generic Letter 88-16 for General Electric Boiling Water Reactor Plants (References 4 and 5). The following Technical Specifications were revised to replace the cycle-specific parameter limits with a reference to the CORE OPERATING LIMITS REPORT:

- a. Average Planar Linear Heat Generation Rate (3/4.2.1)
- b. Linear Heat Generation Rate (3/4.2.4)
- c. Minimum Critical Power Ratio (3/4.2.3)

These operating limits will still be calculated for each cycle using NRC approved methods. The cycle-specific limits will be provided to the plant and to the NRC in the CORE OPERATING LIMITS REPORT (COLR) which will be defined in the Technical Specifications. Enclosure 1 provides the Fermi 2, Cycle 2 (the current operating cycle) COLR. The Technical Specifications will still require the plant to operate within these limits and to take the appropriate action should the limits be exceeded.

In Reference 6, Detroit Edison proposed Technical Specifications for Single Recirculation Loop Operation (SLO). During SLO, the Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) limit is reduced by a factor which is cycle-specific. The current factor for Cycle 2 is 0.90. The SLO Technical Specifications which must be modified to eliminate the cycle specific material are provided in Attachment 4. The Attachment 4 changes should be issued either with the Attachment 3 Technical Specification changes or with the Reference 6 changes, whichever is issued later. A mid-cycle COLR revision to include SLO provisions will be issued prior to SLO implementation. All the Bases changes for SLO which still remain necessary following the approval of this proposal are also included in Attachment 4.

The Technical Specification Bases have been revised to eliminate detail which is cycle-specific in nature.

In conclusion, Detroit Edison believes this submittal is in accordance to the NRC guidance in Generic Letter 88-16 on modifying cycle-specific parameter limits in the Technical Specifications. Since plant operation continues to be limited in accordance with the values of cycle-specific parameter limits that are established using an NRC approved methodology, the change is administrative in nature and there is no impact on plant safety as a consequence. Accordingly, Detroit Edison believes the proposed changes are acceptable.

SIGNIFICANT HAZARDS EVALUATION

Based on the guidance provided by the NRC in Generic Letter 88-16 (Reference 2), the proposed changes remove the values of cycle-specific parameter limits from Fermi 2 Technical Specifications and make other related administrative and format changes.

A Significant Hazards Consideration evaluation is performed for the Technical Specification changes described in the preceding paragraphs. The standards used to arrive at a determination that a request for amendment requires no significant hazards consideration are included in the Commission's Regulations, 10CFR50.92(c). This change is evaluated in conformance with 10CFR50.92(c) by responding to the following three questions:

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?
2. Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated?
3. Does the proposed amendment involve a significant reduction in margin of safety?

These proposed changes do not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequence of an accident previously evaluated. The abnormal operational transients analyzed in the Updated Final Safety Analysis Report (UFSAR) will remain bounded. There will be no change in the operation of the facility as a result of the amendment. No safety-related equipment or function will be altered. The proposed amendment merely removes cycle-specific parameter limits from the Technical Specifications and references their inclusion in the CORE OPERATING LIMITS REPORT and makes other related

administrative changes. NRC approved analytical methodology will continue to be used as the basis for the results that will now be reported in the CORE OPERATING LIMITS REPORT.

2. The proposed amendment does not create the possibility of a new or different kind of accident from an accident previously evaluated. No safety-related equipment or function will be altered as result of this amendment. The requested change does not create any new accident mode. The proposed amendment is in accordance with the guidance provided in Generic Letter 88-16 (Reference 2) for licensees requesting removal of the values of cycle-specific parameter limits from the Technical Specification and making other related administrative changes. The establishment of these limits in accordance with an NRC approved methodology and the incorporation of these limits into the CORE OPERATING LIMITS REPORT will ensure that proper steps have been taken to establish the values of these limits. Furthermore, the submittal of the CORE OPERATING LIMITS REPORT to the NRC will allow the NRC staff to continue to trend the values of these limits without the need for prior approval of these limits.
3. The proposed amendment does not alter the requirement that the plant be operated within the limits for cycle-specific parameters nor the required remedial actions that must be taken if these limits are not met. While it is recognized that such limits are essential to plant safety, the values of such limits can be determined in accordance with NRC approved methods without being in the Technical Specifications. The removal of these limits from the Technical Specifications is coincident with their incorporation into the CORE OPERATING LIMITS REPORT that is submitted to the NRC. Hence, appropriate measures exist to control the values of these limits. Therefore, the proposed changes are administrative in nature and do not impact the operation of the facility in a manner that involves a reduction in the margin of safety. Indeed, as stated in Generic Letter 88-16 (Reference 2), the proposed amendment is responsive to the industry and NRC efforts on improvements in Technical Specifications, and will result in a resource savings for the licensee and the NRC by eliminating the majority of license amendment requests for changes in values of cycle-specific parameters in Technical Specifications.

ENVIRONMENTAL IMPACT

Detroit Edison Company 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 do they increase the types and amounts of effluent 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 Specification changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement 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 NRC regulations and the proposed amendments will not be inimical to the common defense and security or to the health and safety of the public.

The proposed Technical Specification changes ensure the plant conditions remain within the bounds of the initial conditions of the analyses.

Therefore, Detroit Edison believes that this proposal is acceptable and requests prompt consideration and approval.