

**Detroit
Edison**

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Nuclear
Operations

March 23, 1993
NRC-93-0035

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

Subject: Proposed Technical Specification Change (License
Amendment) - Administrative Controls

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 changes to the subject Technical Specifications include a change in the submittal frequency of the Radioactive Effluent Release Report in accordance with a recent rule change and a change to the provisions for delegation of approval of plant procedure changes.

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 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 D. Ohlemacher at (313) 586-4275.

Sincerely,

Enclosure

cc: T. G. Colburn
A. B. Davis
W. J. Kropp
M. P. Phillips
Supervisor, Electric Operators, Michigan
Public Service Commission - J. R. Padgett

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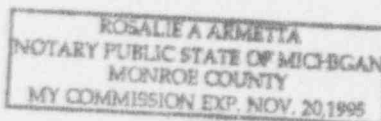
I, WILLIAM S. ORSER, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

William S. Orser

WILLIAM S. ORSER
Executive Vice President

On this 23rd day of March, 1993, before me personally appeared William S. Orser, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosalie A. Armetta
Notary Public



INTRODUCTION

This license amendment request proposes two changes to the Administrative Section of the Technical Specifications. Specifically, these changes involve a change to the reporting frequency of the Radioactive Effluent Release Report as a result of a NRC rule change and a change to the provisions for delegation of approval for plant procedure changes. These proposed changes are discussed below and are provided in an attachment to this letter:

1. The semiannual reporting requirement for the Radioactive Effluent Release Report has been changed to an annual reporting requirement to be in compliance with the 10CFR50.36a rule change. These changes appear throughout the attachment.
2. TS Section 6.8.3 has been revised to allow the Plant Manager to delegate his approval authority for plant procedures in writing to a management representative responsible for the functional area.

EVALUATION

1. Change "Semiannual" to "Annual" Effluent Report

The proposed replacement of the word "Semiannual" with "Annual" for the Radioactive Effluent Release Report will bring the title of this report in compliance with the new requirements of 10CFR50.36a. This will permit submittal of the report on an annual basis rather than semiannual, thus reducing the frequency of regulatory review. In addition, the submittal date has been extended from 60 to 90 days after January 1 of each year. This extension will provide the additional time necessary for preparation and review of a report that will contain data gathered over a longer time period.

2. Plant Manager Delegation of Approval for Plant Procedure Changes.

Currently, Technical Specification 6.8.3 allows the Plant Manager to delegate approval authority in writing for specific types of procedures to a Section Superintendent. This reflected the organizational titles in effect at the time of the drafting of this specification.

Changing the designation as proposed to "management representative responsible for a functional area," retains the intent that approval authority be limited to the appropriate

experienced member of management. The change allows flexibility in assigning titles reducing the need for future Technical Specification changes.

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 to the Technical Specifications include a change in the submittal frequency of the Radioactive Effluent Release Report in accordance with a recent rule change and a change to the provisions for delegation of approval of plant procedure changes.

- 1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes are administrative in nature. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Limiting Condition for Operation, ACTION statement or Surveillance Requirement is affected by any of the proposed changes.
- 2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not introduce a new mode of plant operation or involve a physical modification to the plant. The proposed changes are administrative in nature.
- 3) The proposed changes do not involve a significant reduction in a margin of safety because they are administrative in nature. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Limiting Condition for Operation, ACTION statement or Surveillance Requirement is affected.

Detroit Edison believes that these changes are similar to example (i) of Examples of Amendments which are considered not likely to involve

Significant Hazards Considerations listed in 51FR7751 as they are purely administrative changes to the Technical Specifications.

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.