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Nuclear
Operations

March 23, 1993
NRC-93-0031

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 91-04, "Changes in Technical
Specification Surveillance Intervals to Accommodate
a 24-Month Fuel Cycle," dated April 2, 1991

Subject: Proposed Technical Specification Change (License
Amendment) - Elimination of Shutdown Qualification
from Refueling Interval Surveillance Requirements

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 would eliminate the qualification on some 18-month surveillance requirements that the surveillance is to be performed "during shutdown." The proposal follows the guidance of Generic Letter 91-04 (Reference 2), which gives guidance for Technical Specification (TS) changes to accommodate a 24-month fuel cycle. Although Fermi 2 is not planning to extend the fuel cycle at this time, the guidance as far as the removal of these qualifications is applicable to any fuel cycle length.

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.

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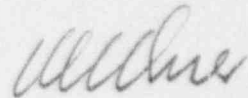
March 23, 1993

NRC-93-0031

Page 2

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

USNRC

March 23, 1993

NRC-93-0031

Page 3

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

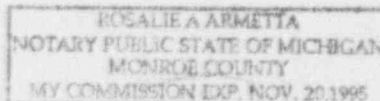
WILLIAM S. ORSER

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

Many Technical Specification (TS) surveillance requirements are specified to be performed on an 18-month interval. This interval corresponds to the length of a normal Fermi 2 fuel cycle. The 18-month interval allows surveillances normally performed during outages to be performed at the regularly scheduled refueling outages.

In addition, in some cases, a qualification is added to some 18-month surveillance requirements that the surveillance is to be performed "during shutdown". These qualifiers are rooted in the assumption that it is always safer to perform a surveillance in the shutdown condition.

The NRC in Generic Letter 91-04 (Reference 2) addressed removing the "during shutdown" qualifications from refueling interval surveillance requirements. In this document the staff concluded that the "during shutdown" qualifiers are not necessary. In addition, the staff indicated that the Bases for TS 4.0.2 need to be modified to reflect this change. This proposal makes these changes following the Generic Letter guidance.

The qualification that surveillances must be performed during shutdown is being removed from all 18-month surveillances when it appears. The following system surveillance requirements are affected:

- o Standby Liquid Control System
- o Emergency Equipment Cooling Water System
- o Emergency Equipment Service Water System
- o A.C. Sources - Operating
- o DC Sources - Operating

EVALUATION

In Generic Letter 91-04, the NRC staff concluded "that the TS need not restrict surveillances as only being performed during shutdown." The staff reached that conclusion because the "during shutdown" qualification could be confused with the defined terms "Hot" and "Cold Shutdown". In addition, the staff indicated that the consideration of when surveillance performance should be restricted had not been consistently applied throughout the TS.

The performance of some 18-month surveillances during operation could benefit safety. Included are those currently specified to be performed "during shutdown". Safety could benefit two ways.

First, the availability of the tested equipment could be more important to safety when the plant is shutdown. Typically, less equipment is provided for the mitigation of events during shutdown and, in addition, the greater activity during a refueling outage increases the risk of an event initiator.

Second, the performance of a surveillance during operation could act to reduce the complexity of a refueling outage activities. This would reduce the challenges faced by the operators to control activities and reduce the chance of the occurrence of an event.

The NRC staff addressed, in Generic Letter 91-04, the need to give proper regard for the effect on safe plant operation when scheduling surveillances. The staff guidance provided a change to the Bases of TS 4.0.2 to address this issue. Because Detroit Edison is not implementing the cycle length extension discussed in the generic letter, the exact wording provided cannot be used. The proposed bases change for TS 4.0.2 indicates that it is not intended intended to perform surveillance with an 18-month interval during operation unless it is consistent with safe plant operation. This retains the staff intent.

In summary, the proposed change to eliminate the "during shutdown" qualifications from certain Surveillance Requirements is acceptable because it promotes clarity and consistency of the TS. In addition, the change provides the flexibility to perform these surveillances during plant operation when warranted.

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 change eliminates the qualification that certain 18-month surveillances be performed during shutdown. The change does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The change removes a requirement that certain surveillances be performed during

shutdown. The surveillances will still be required to be performed under the provisions of the TS Limiting Condition for Operation (LCO) and Action Requirements. These provisions assure that adequate equipment is available to mitigate accidents. The proposed change does not eliminate, but rather reinforces, the guidance that surveillance activities must be scheduled with regard to their impact on plant safety. Therefore, the change does not involve a significant increase in the probability or consequences of an accident.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not affect the plant design. Equipment removed from service and any plant surveillance activities are still restricted by the TS LCO's and Action Requirements and all Surveillances must still be scheduled with regard to their impact on safety.
- 3) Involve a significant reduction in a margin of safety. By giving flexibility to schedule surveillances during operation when consistent with safe plant operation the margin of safety is not significantly affected.

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.