

**Detroit
Edison**

William S. Orser
Senior Vice President

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5201



Nuclear
Operations

August 1, 1990
NRC-90-0105

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) Detroit Edison Letter to NRC, "Proposed Technical Specification (License Amendment) Change - Administrative Controls", NRC-89-0160, dated July 24, 1989

Subject: Proposed Technical Specification Change (License Amendment) - Administrative Controls (Section 6)

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 change the title of "Vice President - Nuclear Operations" to "Assistant Vice President and Manager - Nuclear Production" to reflect Detroit Edison's new onsite nuclear organization. Additionally, a second change proposed herein modifies the membership requirements for the Nuclear Safety Review Group (NSRG). This letter proposal will allow the Senior Vice President - Nuclear Generation more flexibility in appointing qualified NSRG members.

Please note that Reference 2 proposed changes to some of the attached pages. If the Reference 2 is approved prior to approval of this request the formatting effects of Reference 2 changes on the attached pages must be considered.

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.

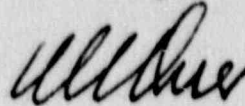
9008130085 900801
PDR ADDCK 03000341
P PDC

ADD1
1/1

USNRC
August 1, 1990
NRC-90-0105
Page 2

If you have any questions, please contact Mr. Gordon Nader at (713)
586-4513.

Sincerely,



Enclosure

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

USNRC

August 1, 1990

NRC-90-0105

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
Senior Vice President

On this 1st day of August, 1990, 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

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

INTRODUCTION

This amendment request consists of two changes to the Administrative Section of the Technical Specifications (TSs). Specifically, the title of "Vice President - Nuclear Operations" has been proposed to be changed to "Assistant Vice President and Manager - Nuclear Production" to reflect Detroit Edison's new onsite nuclear organization. This title change appears throughout the proposed TSs (attached). A second change proposed by this amendment request modifies the membership requirements for the Nuclear Safety Review Group (NSRG).

EVALUATION

The functional responsibility for operation, maintenance, modification, training, outage management, security, radiation protection and technical engineering of Detroit Edison's nuclear power plants previously belonged to the individual with the title of Vice President - Nuclear Operation. As a result of recent upper management personnel changes Detroit Edison's Board of Directors changed the title of Vice President - Nuclear Operations to Assistant Vice President and Manager - Nuclear Production. This title change does not alter the authority, function or responsibility of the subject position as it relates to any TS requirement. The individual in this position will continue to report directly to the Senior Vice President - Nuclear Generation. Please note that subsequent to the Board of Directors decision to change the title of Vice President - Nuclear Operations to Assistant Vice President and Manager - Nuclear Production the functional responsibility for security of Detroit Edison's nuclear power plants has been transferred to the General Director - Nuclear Assurance. This organization change is not related to any specific Technical Specification requirement. Thus, because this title change is only administrative in nature all the proposed functions of the Vice President - Nuclear Operations as outlined in TS Section 6 have been proposed to be changed to Assistant Vice President and Manager - Nuclear Production. Please note that any future changes in the function, authority or responsibility of this position will have to be appropriately evaluated.

The purpose of the NSRG is to provide independent review and audit of facility operations. The NSRG reports to the Senior Vice President - Nuclear Generation and acts for him in the review and audit of the safety aspects of nuclear power plant operation. The existing specification requires that NSRG members have at least a bachelor's degree in engineering or related sciences, and at least 5 years of cumulative professional level experience in one or more of the following fields:

- a) Nuclear power plant operations
- b) Nuclear engineering
- c) Chemistry
- d) Metallurgy
- e) Instrumentation and Control
- f) Radiological Controls
- g) Mechanical and electrical engineering, and
- h) Quality assurance practices

Detroit Edison believes these requirements unnecessarily restrict experienced individuals who do not have a bachelor's degree in engineering or related sciences from being appointed to the NSRG.

NSRG members are appointed by the Senior Vice President - Nuclear Generation. The Senior Vice President - Nuclear Generation is responsible for determining that an individual has the expertise and experience commensurate with the duties of an NSRG member. He should not be prohibited from appointing an otherwise qualified individual to the NSRG because the individual does not have a bachelor's degree in engineering or related sciences. The proposed TS is written such that individuals who do not have a bachelor's degree in engineering or related sciences must have at least 10 years of responsible power plant experience of which a minimum of 3 years shall be nuclear power plant experience. The proposed wording is consistent with the most restrictive years of experience requirement of ANSI N18.1-1971 "American National Standard Selection and Training of Nuclear Power Plant Personnel". This standard is applicable, per TS 6.3.1 (attached), to each member of the unit staff except for the Superintendent - Radiation Protection. Therefore, with the addition of the proposed wording the Senior Vice President - Nuclear Generation will not be prohibited from appointing individuals qualified by experience rather than education to the NSRG. The existing requirement for at least 5 years of cumulative experience in one or more of the specified fields will also apply to individuals meeting the proposed experience criteria. Please note that the Standard Technical Specifications do not specify education or experience requirements for NSRG members.

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.

- 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. The proposed title change from Vice President - Nuclear Operations to Assistant Vice President and Manager - Nuclear Production does not alter the authority, function or responsibility of the subject position as it relates to any TS requirement. The individual in this position will continue to report directly to the Senior Vice President - Nuclear Generation. The proposed change to the NSRG membership requirements is consistent with the most restrictive years of experience requirement of ANSI N18.1-1971. The existing and proposed NSRG membership requirements are more restrictive than the Standard Technical Specification.
- 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. As outlined in Item 1 above the proposed changes are administrative in nature.
- 3) The proposed change does not involve a significant reduction in a margin of safety because as outlined in Item 1 above 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.

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.