



Robert McKeon
Assistant Vice President
and Manager, Operations

Fermi 2
6400 North Dixie Hwy
Newport, Michigan 48166
(313) 586-5249



November 3, 1995
NRC-95-0123

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, "Submittal and Request for Review of Revision 13 to the Fermi 2 Radiological Emergency Response Preparedness Plan", NRC-95-0040, dated April 10, 1995
 - 3) NRC Letter to Detroit Edison, "Request for Additional Information Regarding Revision 13 to the Fermi 2 Radiological Emergency Response Preparedness Plan (TAC No. M92348)", dated August 16, 1995

Subject: Detroit Edison Response to the NRC Request for Additional Information Regarding Fermi 2 Radiological Emergency Response Preparedness Plan

The purpose of this letter is to provide the response to the NRC Request for Additional Information (Reference 3) regarding Fermi 2 Radiological Emergency Response Preparedness Plan Revision 13 (Reference 2) to implement Emergency Action Level changes in accordance with NUMARC/NESP-007. In response, Detroit Edison submits the following:

Attachment 1: Responses to each of the numbered requests contained in Reference 3.

Attachment 2: The revised Technical Basis Document.

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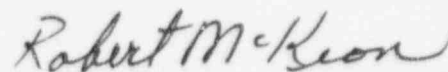
Attachment 3: Draft copy of EP-101, Classification of Emergencies.

Attachment 4: Radiological Emergency Response Preparedness Plan Rev. 17,
section D.

Please note that EP-101 is submitted as a draft only and that minor changes may be included in the final version. Revision 17 of the Radiological Emergency Response Preparedness Plan, Section D includes the revisions made as a result of the NRC request. Prompt approval is requested.

If you have any questions related to this submittal, please contact Kevin Morris at (313) 586-4327.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert McKee".

Attachment

cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel

Attachment 1 to NRC-95-0123

Responses to each of the numbered requests contained in
the NRC Request for Additional Information

Detroit Edison Response to
NRC Request for Additional Information
Regarding Fermi 2

EAL Revision to NUMARC/NESP-007 Methodology

The following responses are numbered to correspond to the NRC request for additional information:

1. Changed AA2 EALs 1 and 2 to replace the word "unanticipated" with "unplanned".
2. The number 29.100.01 is readily recognized by personnel responsible for classifying emergencies as the Emergency Operating Procedure (EOP) Flowcharts. Table 14 of 29.100.01 contains the maximum normal and maximum safe operating radiation levels. The Fermi 2 EAL AA3-2 contains a concise and accurate description of the action level. As a matter of policy, Fermi 2 prefers to not copy tables from EOPs into the EAL as a means to prevent future inaccuracies. The EOPs, including tables and curves, are available in the Control Room and TSC and are monitored by personnel in those facilities.
3. Revised EAL FC1 to add "Primary coolant activity level greater than" prior to "300 uCi/gm DE I-131".
4. Deleted RCS EAL 5.
5. In addition to the human factor and comprehensiveness considerations previously submitted, we disagree with weighting the containment barrier less than the fuel clad and reactor coolant when combined with other barrier failures. As stated in NESP-007, Section 3.8, containment failure is a component of the leading contributors to latent fatalities. We further assert that any loss or potential loss of two fission product barriers satisfies the definition of Site Area Emergency (from NUREG-0654) in that it involves actual or likely major failures of plant functions needed for the protection of the public. We have revised our Technical Basis Document to reflect the above argument.
6. Deleted RCS Loss EAL 1 and added SA6 - Main Steam Line Break.
7. The initiating condition HA1 is "Natural and Destructive Phenomena Affecting the Plant Vital Area". At Fermi 2, all plant vital areas containing safety systems are within the Reactor Building, Auxiliary Building, or RHR Complex. Therefore, no other areas need be included. EAL 4 is intended to reflect the judgment of Control Room personnel since all other readily identifiable instrumentation are contained in other EALs. EAL 4 was reworded as follows: "Control Room indications that in the

judgment of Control Room personnel reflect damage to the Reactor Building, Auxiliary Building, or RHR Complex.

8. NESP-007 states in the basis for HA6 that "This EAL is intended to address unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the Alert emergency class". Fermi 2 believes the best description of those conditions is the definition of Alert as stated in NUREG-0654 (and referenced in NESP-007, Section 3.2). Therefore, Fermi 2 uses the definition of Alert as the EAL for HA6.
9. Deleted mode 4 from SU5.
10. Deleted loss of non-technical specification systems from SA3.
11. Revised SS6 EAL 1 third "and" statement to read "Indications needed to monitor safety functions associated with lost annunciators unavailable". The statement now clearly refers to safety systems with annunciation on panels P-601, 602, or 603. The applicable indications for those systems is common operator knowledge.
12. Revised Technical Basis Document to include that emergency depressurization is used as an indication of degraded core cooling because it is readily recognized and it assumes all compensatory actions have been taken.
13. As explained in the NESP-007 SG2 basis, for BWRs, considerations include inability to remove heat via the condenser, or via the torus. Extreme challenges to containment result in emergency depressurization and therefore we feel are appropriate to include in the EAL. Also, as stated in Response 12, conditions requiring emergency depressurization are readily recognized and assume all compensatory actions have been taken.

Additionally, as part of the review process to address the NRC request for additional information, minor editorial changes unrelated to the NRC comments were made to the RERP Plan and Technical Basis Document.

Attachment 2 to NRC-95-0123

The revised Technical Basis Document