

DS09

William S. Orser
Senior Vice President

Detroit
Edison

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

Robert C. Jones, Jr.
57FR6748
2/27/92



Nuclear
Operations

April 29, 1992
NRC-92-0053

Chief, Regulatory Publications Branch
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

- Reference: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NUREG-1449, Draft Report for Comment
published February 1992

Subject: Detroit Edison's Comments on NUREG-1449
"Shutdown and Low-Power Operation at Commercial
Nuclear Power Plants in the United States"

OFFICE OF USNRC
ADMINISTRATION
92 APR 30 P3:17

Detroit Edison agrees that proper management of outage activities can reduce both the likelihood and consequences of events. Detroit Edison shares the same concerns and Senior Management from Fermi 2 have participated in NUMARC's, "Shutdown Plant Issues Working Group". NUMARC formed the Working Group to coordinate industry activities relating to shutdown safety. In December 1991, the Working Group published, "Guidelines for Industry Actions to Assess Shutdown Management". Detroit Edison agrees with the guidance.

Detroit Edison finds that NUREG-1449 is a very comprehensive report which contains a thorough evaluation of shutdown and low-power operations at nuclear power plants. Detroit Edison agrees that public health and safety has been adequately protected while plants were in shutdown conditions. However, safety improvements are possible and warranted. Detroit Edison certainly agrees that the premise "shutdown" does not necessarily mean "safe".

The NRC staff, however, makes statements in the report with which Detroit Edison does not completely agree. An example of this is in the Executive Summary, page XV, "Mark I and II BWR secondary containments offer little protection", ... etc. The Fermi 2 secondary containment offers substantial processing capabilities when ventilation, heat transfer and condensation effects are realistically considered. A second example refers to Section 5.1.2.3 of NUREG-1449, "Fire Protection".

9205040120 920429
PDR PR
MISC 57FR6748 PDR

Chief, Regulatory Publications Branch
U. S. Nuclear Regulatory Commission
April 29, 1992
NRC-92-0053
Page 2

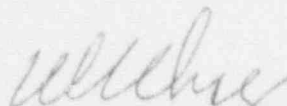
NUREG-1449 does not consider that fire protection equipment is required to be operable at all times that the technical specification equipment that it is protecting is required to be operable. Detroit Edison does agree with most of the principal findings and conclusions reached by NUREG-1449.

Detroit Edison's primary concern is that all changes implemented as a result of NUREG-1449 will not have the proper regulatory review process. As an example, NUREG-1449 recommends changes to the "License Examiners Handbook", which in the past has been revised without a review by licensees. Changes to the "License Examiners Handbook" need to be properly evaluated and validated to assure stress to operating crews is not increased. Detroit Edison believes that an open forum for all changes implemented as a result of the NUREG is the most productive approach.

NUMARC and the BWR Owners Group have commented on NUREG-1449. Detroit Edison agrees with the comments submitted by NUMARC and the BWR Owners Group.

The opportunity to comment on NUREG-1449 is appreciated by Detroit Edison. If you have any questions concerning these comments, please contact Mr. Joseph M. Pendergast, Compliance Engineer at (313) 586-1682.

Sincerely,



cc: T. G. Colburn
A. B. Davis
M. P. Phillips
S. Stasek
Region III