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March 9, 1985
EF2-72236

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

- Reference:
- (1) Fermi 2
NRC Docket No. 50-341
 - (2) Detroit Edison to NRC Region III Letter,
"Post - Fuel Load Preoperational
Testing," NE-84-1792, January 11, 1985
 - (3) Detroit Edison to NRC Letter, "Fermi 2
Technical Specification Certification,"
EF2-72019, November 26, 1984

Subject: Request for Issuance of Operating License

The Detroit Edison Company with this letter certifies that the design, construction and preoperational testing of Fermi 2 are substantially complete and we will be ready to load fuel on March 18, 1985. We would like to receive the Operating License on or about March 15, 1985, to allow careful review of the license, particularly the Technical Specifications, before loading fuel. The Final Safety Analysis Report and other licensing documents and letters submitted to the NRC provide an accurate description of the constructed plant and the organization and administration, except for future activities specifically noted in those documents or herein. Inherent to this statement is the acknowledgement of the normal update process which translates current construction documents into submittals to the NRC, e.g., design drawings to FSAR figures. Edison's position that Fermi 2 is ready for fuel load is supported by the following:

A. Personnel Readiness

The Nuclear Production Staff has completed the qualification of its Senior Reactor Operators and Reactor Operators to provide the required staffing. Their training included the required classroom instruction

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and time on shift at other operating plants. The operating staff is supplemented by contract Shift Operating Advisors until all necessary Fermi 2 staff have accumulated the required level of operating experience. The experience and training of these individuals have been detailed in submittals to the NRC to document their acceptability.

The qualifications and experience of Fermi 2 management have been documented and provided to the NRC. These qualifications confirm that Fermi 2 will be managed and operated in a safe and prudent manner.

The engineering support staff has extensive experience with the design, construction and testing of Fermi 2. This knowledge within the Edison staff ensures that long-term operation will be conducted with insight to past concerns and issues. Similarly, the administrative staff has been trained to further ensure the appropriate level of readiness.

The security system has been activated and is operational. The activation followed system testing and an extensive training program for site personnel on security and safety.

The June 26-27, 1984, Fermi 2 Full-Scale Emergency Exercise demonstrated that Edison and the offsite agencies in the EPZ can promptly and properly respond to radiological emergencies.

To properly support the transition from construction to operation, Edison transferred, as of August 1, 1984, the responsibility for the project and completion of remaining items from the Project Management Organization to the Nuclear Operations Organization. Appropriate elements of the Project Organization have been retained under Nuclear Operations control to assist ongoing construction activities and to help resolve issues which may arise during power ascension tests.

B. Design/Construction Readiness

The Fermi 2 design and construction are in accordance with the Final Safety Analysis Report (FSAR) and correspondence submitted to the NRC.

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Outstanding work activities identified by the NRC or Edison as restraints to fuel load are being completed accordingly. With reference to the operability of the emergency diesel generators, the damaged units have been repaired and will be tested and ready to support plant operations before fuel load. In addition, the electrical and instrumentation and controls drawing/as-built deviations, as agreed in the February 20 meeting (Category A and Category B hardware items), will be corrected before loading fuel. Other work items have been reviewed, evaluated and concurred that they are not required for safe operation at fuel load. They have been reviewed with the NRC Resident Inspector and are being tracked on the Milestone Report against appropriate completion milestones.

C. Preoperational Tests

The preoperational tests to date confirm the capability of those systems tested to perform their design functions. Preoperational tests of systems required to support fuel load have been completed. A few systems, not required for fuel load and/or which require reactor steam to be fully tested, will be tested at a later date as noted to you in Reference (2).

D. Procedures

Procedures necessary for fuel load have been identified. They will be reviewed and approved and will be effective before fuel load. The remaining procedures will be completed commensurate with operating needs.

E. Licensing Issues

Edison has maintained active communication with both NRR and Region III to ensure open items are mutually understood and resolved in an expeditious manner.

The general areas requiring Edison action are discussed below.

NRR Items: Continuous dialogue has occurred with the NRR Project Manager (Mr. M. D. Lynch) to discuss and status open items requiring resolution. There are currently no fuel-load related open items from NRR that require an Edison response.

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10CFR50.55(e) Items: Edison has provided to the NRC either an interim or final response to the open 50.55(e) concerns. Edison considers that none of the open 50.55(e) items are constraints to fuel load.

Inspection Report Noncompliances: Edison has provided comprehensive responses to the open noncompliances in accordance with the federal requirements. Where responses have not been submitted, due to either time constraints (i.e., a 30-day response is not required until post fuel load) or the nature of the issue, the items have been discussed with the NRC Resident Inspector and Region III Project Management and concurrence has been reached as to appropriate milestone dates for the items. None of the open items are judged to be of sufficient concern to be a constraint to fuel load. This applies to noncompliances, open and unresolved items.

Technical Specifications: The final draft of the Fermi 2 Technical Specifications was certified by Edison in Reference (3). Since then, Edison has requested several modifications to the draft Fermi 2 Technical Specifications to reflect the results of preoperational and surveillance testing, to improve clarity, and to correct minor typographical errors. Each of the proposed changes has been carefully reviewed and found to be necessary to reflect the plant design and procedures. Accordingly, incorporation of these items into final Technical Specifications issued as Appendix A to the License is considered essential.

F. Design/Construction Assurance Reviews

Fermi 2 has undergone several independent reviews and many internal reviews to verify it was designed and built in accordance with the applicable codes, standards and procedures. A brief description of the independent reviews and their results follows.

CYGNA Independent Design Review: CYGNA Energy Services, Inc., performed an independent assessment of key elements in the shutdown cooling path and the design control process at Fermi 2. The multi-disciplined assessment concluded the "design and design control activities on Fermi-2 have been adequately performed in accordance with the project commitments

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and standard engineering practice. Furthermore, sufficient assurance exists that the public health and safety will be protected." The initial report and supplements have been provided to the NRC as well as applicable Edison responses.

Final Construction Assessment: Duke Power Company conducted an assessment of the constructed plant. The main purposes of this assessment were to: (1) make a final walkdown of parts of the safety-related systems and structures in the Reactor and Auxiliary Buildings to determine if significant deviations from final design disclosure documents exist; (2) review and evaluate previous "third-party" assessment reports to determine whether they can be incorporated into the conclusions of the final assessment of the construction report; and (3) provide a report on "Fermi 2 Final Assessment of Construction" to Edison and the NRC.

The Duke Power report concluded that the construction of Fermi 2 was conducted in an acceptable manner and in conformance with the design documents, subject to the resolution of specific concerns. The individual concerns have been closed by the NRC (21 of 24), are resolved within Edison and available for NRC review (2), or are agreed to be a post-fuel load item.

SAFETEAM: An organization independent from the project has the opportunity to interview all personnel (craft, technical and administrative) when they leave the Fermi 2 project. In addition, QA/QC personnel are periodically interviewed to confirm that adequate corrective actions are being initiated in response to their concerns. Concerns identified in these interviews and their resolution are formally documented. This program has been audited by the NRC and is monitored by the NRC Senior Resident Inspector onsite.

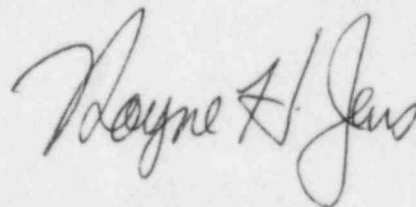
In addition to the independent reviews described above, Detroit Edison has completed an extensive walkdown program to assure that lead design documents and drawings are adequately updated and reconciled with the as-constructed unit in order to support efficient operation and maintenance of the plant.

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In addition to the above, Edison has performed various internal 'readiness-for-fuel load' evaluations. These evaluations, including one performed by an independent contractor, enabled me to inform the Nuclear Review Committee of the Board of Directors of Detroit Edison at their meeting on December 19, 1984, that Fermi 2 was closely approaching readiness to load fuel. Assuming receipt of the Operating License by March 15, 1985, a conference call will be held on that date with the Nuclear Review Committee members to allow me to complete my recommendation that Fermi 2 is ready to load fuel. Notwithstanding, once the operating license is issued, the Plant Superintendent, the Manager of Nuclear Operations, and I will withhold permission to load fuel until we are convinced that the plant and plant staff are ready.

To the best of my knowledge, the foregoing paragraphs address the major activities which bear on your issuance of the Fermi 2 Operating License. Accordingly, we respectfully request issuance of the operating license by March 15, 1985, so that this activity may proceed as planned.

Sincerely,



cc: Mr. P. M. Byron
Mr. J. G. Keppler
Mr. R. C. Knop
Mr. M. D. Lynch
Mr. B. J. Youngblood
USNRC Document Control Desk
Washington, D. C. 20555