

Detroit
Edison

William S. Orser
Senior Vice President

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Nuclear
Operations

July 6, 1992
NRC-92-0077

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, NRC-91-0102, "Proposed License Amendment - Up-rated Power Operation", dated September 24, 1991.
 - 3) Detroit Edison Letter, NRC-92-0048, "Revision to Proposed License Amendment for Up-rated Power Operation and to the Fermi 2 Power Up-rate Safety Analysis (TAC No. M82102)", dated April 30, 1992.
 - 4) NRC Letter, "Fermi-2 - Request for Additional Information Up-rated Power Operation License Amendment Request (TAC No. M82102)", dated March 24, 1992.
 - 5) Detroit Edison Letter, NRC-92-0050, "Detroit Edison Response to Reactor Systems Branch Questions on Fermi 2 Power Up-rate Submittal", dated April 23, 1992.
 - 6) NRC Letter, "Response to Issues Raised by the Advisory Committee on Reactor Safeguards (ACRS) Regarding Fermi-2 Power Up-rate Submittal (TAC No. M82102)", dated June 3, 1992.
 - 7) NRC Letter, "Response to Issues Raised by the Advisory Committee on Reactor Safeguards (ACRS) Regarding Generic Boiling Water Reactor Power Up-rate Program (TAC No. M81253)", dated June 3, 1992.

Subject: Detroit Edison Response to Issues Raised by the Advisory Committee on Reactor Safeguards (ACRS) Regarding Fermi 2 Power Up-rate Program Submittal (TAC No. M82102)

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References 2 and 3 provided the NRC Staff with Detroit Edison's proposed and revised License Amendment for Upgraded Power Operation (commonly referred to as the Power Upgrade Program [PUP]). Prior to the Reference 3 submittal, on March 26, 1992, the NRC Staff, General Electric (GE), and Detroit Edison personnel attended a meeting of the ACRS Sub-Committee on Thermal Hydraulic Phenomena, during which presentations were made by the NRC, GE, and Detroit Edison representatives on both the generic Boiling Water Reactor (BWR) PUP and the Fermi 2 PUP. The ACRS asked a number of questions regarding these PUP efforts. On May 20, 1992, GE and Detroit Edison personnel met with W. Colburn and R. Stransky of your staff to review the ACRS technical questions and the issues involved with each ACRS comment; to establish a course of action for the NRC to formally identify these comments on the docket, and to review the plan and schedule for Detroit Edison and GE responses. The purpose of this letter is to respond to the ACRS comments provided to Fermi 2 via the NRC Staff in Reference 6. It should be noted that GE is separately responding to the generic BWR PUP issues raised by the ACRS (as documented in Reference 7). Detroit Edison has reviewed GE's proposed response to Reference 7 and concurs with its content.

Detroit Edison's responses to Reference 6 are given in Enclosure 1. A question and response format is provided to ensure completeness and ease of review. The Fermi 2 PUP project staff would be happy to meet with NRC Staff or ACRS personnel to further discuss our responses, if necessary. Your facilitation of the review of this information with the ACRS, in support of the PUP License Amendment request, is appreciated.

Reference 6 states that Detroit Edison's response to a Staff Request for Additional Information (RAI) addresses a number of these (ACRS) questions. This Staff RAI was provided to Detroit Edison by Reference 4. Detroit Edison's response to this RAI is contained in Reference 5. Also, some of these ACRS questions overlap with the Reference 7 letter to GE. Although specific Detroit Edison responses, which are considered "stand alone" and complete, to each ACRS comment are provided in Enclosure 1, the relationship between these questions, the Staff RAI, Detroit Edison's response to the RAI and the GE responses to Reference 7 is provided in Enclosure 2 to assist you and the ACRS in developing a more complete understanding of these complex issues.

A substantial portion of Enclosure 1 to this letter was provided by GE and has been identified therein as proprietary information. The Attachment to this letter provides GE's affidavit to that effect. Therefore, in accordance with 10 CFR 2.790(a)(4), it is requested that Enclosure 1 and the Attachment be withheld from public disclosure.

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Please contact Mr. Terry L. Riley, Supervisor of Nuclear Licensing, Regulatory Affairs, at (313) 586-1684, to coordinate any further actions which you may require on this matter, as needed.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. L. Riley", is written over the typed name "W. L. Riley". The signature is fluid and cursive.

Enclosures (2)
Attachment (1)

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

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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 6th day of July, 1992, before me personally appeared William S. Orser, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosele Q. Arnette
Notary Public

