



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MEMORANDUM TO: Biweekly Notice Coordinator

FROM: Stewart W. Brown, Project Manager
Low-Level Waste and Decommissioning
Project Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE OF
CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING
LICENSE, PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION
DETERMINATION, AND OPPORTUNITY FOR A HEARING (TAC NO.
L51458)

Detroit Edison Company, Docket No. 50-16, Enrico Fermi Atomic Power Plant,
Unit 1, Monroe County, Michigan

Date of amendment request: August 29, 1996 (Reference NRC-96-0111)

Description of amendment request: The proposed amendment will: (1) allow
certain equipment and instruments to be removed from service for short periods
of time to allow for maintenance, testing, inspection, modifications, and
account for equipment failures; (2) reduce the frequency of environmental
liquid effluent monitoring and eliminate one raw water sampling location; (3)
eliminate the requirement for moisture intrusion monitoring for the reactor
building lower level; and (4) correction of a typographical error.

Basis for proposed no significant hazards consideration determination: As
required by 10 CFR 50.91(a), the licensee has provided its analysis of the

issue of no significant hazards consideration using the standards in 10 CFR 50.92(c). The licensee's analysis is presented below:

- (1) The operation of Enrico Fermi Atomic Power Plant, Unit 1, in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not involve a significant increase in the probability or consequences of an accident. Provisions for removing the primary cover gas supply from service for short periods of time will not significantly increase the probability of an accident occurring as long as the probability of a significant water reaction with residual sodium is not significantly increased. This is ensured by prescribing limits on the time that carbon dioxide pressure can be low. The consequences of an accident would not be affected by provisions for removing the primary cover gas supply from service as this equipment does not mitigate accidents or affect the accident sequences. Similarly, the provisions for removing the moisture intrusion and cover gas pressure alarms from service for short period of time will not significantly increase the probability of an accident. The alarms provide a monitoring function to detect degradation in the performance of the cover gas supply and sump systems. Absence of these alarm functions for short periods of time does not increase the probability of such degradation and it does not significantly impact the ability for timely detection of such degradation. The consequences of an accident would not be affected by provisions for removing the moisture intrusion and cover gas pressure alarms from service as this equipment does not mitigate accidents or

affect the accident sequences. Elimination of the moisture intrusion alarm for the reactor building lower level does not significantly increase the probability of an accident because the probability that water could accumulate in this area is essentially unchanged. Design features of the foundation, containment structure, and annulus drains are intended to prevent entry of water into the reactor building. These features have prevented any water intrusion into this area. The consequences of an accident would not be affected by elimination of the moisture intrusion alarm for the reactor building lower level because this equipment does not mitigate accidents or affect the accident sequences. The Safety Evaluation Supporting Amendment 9 to the referenced license did not rely on moisture intrusion monitoring and alarm features for any safety function or accident prevention or mitigation function. Environmental monitoring surveillance are unrelated to postulated accident sequences and cannot affect the probability or consequences of an accident. The correction of the typographical error is unrelated to accident initiation and sequences and cannot affect the probability or consequences of any accident.

- (2) The operation of Enrico Fermi Atomic Power Plant, Unit 1, in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not create the possibility of a new or different accident from any previously evaluated. With the exception of the allowance for composite environmental samples, which are unrelated to any potential accident sequence, these changes propose no new activities or new methods for performing existing activities.

Previous evaluations have considered the release of all of the radioactivity in the residual sodium due to postulated fire or other catastrophe and release of radioactive water stored in the liquid waste tanks which bound the only possible radiological accidents at Fermi 1. For these reasons, no new or different type of accident is created by these changes.

- (3) The operation of Enrico Fermi Atomic Power Plant, Unit 1, in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant reduction in a margin of safety. The changes to the primary system cover gas system technical specifications still ensure that any residual sodium is passivated by carbon dioxide. Changes to the alarms affect only monitoring functions and therefore do not cause a change to any parameter that could affect the margin of safety. Similarly, the environmental surveillances are unrelated to margin of safety. The correction of the typographical error is unrelated to margin of safety. For these reasons, the proposed changes do not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the

NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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