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10CFR50.54(q)

October 25, 1996  
NRC-96-0121

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Reference: Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43

Subject: Submittal of Revision 18 to the Fermi 2 Radiological  
Emergency Response Preparedness Plan

Pursuant to 10 CFR 50.54(q), Detroit Edison hereby submits Revision 18 to the Radiological Emergency Response Preparedness Plan (RERP Plan).

Revision 18 is the result of the 1996 annual RERP Plan review. It includes administrative-type changes such as revising the Emergency Response Organization (ERO) to reflect changes within the Nuclear Generation and Corporate Organizations, and personnel assignments within the ERO. It incorporates changing the annual exercise requirement to biennial in accordance with 10 CFR 50 Appendix E as revised July 19, 1996. It includes a clarification to the response times for staff augmentation and the means for disseminating public information annually. It incorporates updates to two support agreements. Also it incorporates changes made in the state government and to the Michigan Emergency Management Plan.

Revision 18 to the RERP Plan has been reviewed in accordance with 10 CFR 50.54(q) and approved by the Onsite Review Organization in accordance with Technical Specification 6.5. The changes made in this revision are described in Enclosure 1, "Effectiveness Review Documentation," and do not decrease the effectiveness of the Plan. The Plan, including Revision 18, continues to meet the requirements and standards of 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

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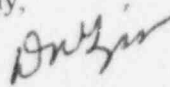
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Enclosure 2 is an uncontrolled copy of the revised sections of Revision 18. Revision bars mark the changes.

This information is being submitted in accordance with 10 CFR 50.4(b)(5)(ii). In addition, controlled copies of Revision 18 have been sent under separate cover to the NRC Document Control Desk, the Region III Incident Response Center, and the Site Inspector.

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

Sincerely,



Enclosures (2)

cc: A. J. Kugler  
A. B. Beach (2 copies)  
M. J. Jordan  
A. Vogel (1 copy)

Enclosure 1 to  
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**EFFECTIVENESS REVIEW DOCUMENTATION**

**EFFECTIVENESS REVIEW DOCUMENTATION**  
Radiological Emergency Response Preparedness Plan, Revision 18

<b>Document</b> RERP Plan Revision 18		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
<b>Section/Page</b>	<b>Change</b>	<b>Basis</b>
A.2/A-2, A-3 A.5.4/A-5 Table B-2/B-5 C.1/C-2 I.3.1.1/I-2 M.2/M-4 Figure M-1/M-7 O.2/O-2 App 3/App 3-4	<i>Clarifications, title changes and grammatical corrections</i>	<i>Editorial changes which constitute no change in content or intent of the RERP Plan. These changes have no impact on regulatory requirements of 10CFR50.47 and 10CFR50 Appendix E. Therefore, the effectiveness of the Plan is not reduced and the planning standards continue to be met.</i>
A.5.5/A-5 C.2/C-2 App 1/A1-2, A1-10, A1-11, A1-12, A1-31, A1-32, A1-33, A1-34, A1-35, A1-36, A1-37	Updated utility mutual emergency assistance agreement to reflect removal of Cleveland Electric Illuminating and Toledo Edison. Updated BWR Emergency Support Program to reflect GE SIL 324 Rev. 5.	Both agreements are still in place. 10CFR50.47 and 10CFR50 Appendix E require offsite support agreements be contained in the Plan. Therefore, the effectiveness of the Plan is not reduced and the planning standards continue to be met.

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<b>B.1.2/B-1</b>	<b><i>Added that there may be some conditions where it may take up to 60 minutes to staff the positions listed in the Alert +30 minute column of Table B-1.</i></b>	<b><i>The UFSAR section 7.8.2 states that the TSC can be operational within approximately 60 minutes of notifying personnel. The NRC acknowledged in SER Supplement 5 section 13.3 that there may be some conditions where it may take up to 60 minutes to staff the 30 minute augmentation positions and found that acceptable. 10CFR50.47 and 10CFR50 Appendix E require the emergency response organization to be unambiguously defined and timely augmentation of response capabilities maintained. Therefore, the effectiveness of the Plan is not reduced and the planning standards continue to be met.</i></b>

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<i>N.1/N-1 N.2.5/N-2 N.2.1/N-1 N.2.6/N-2</i>	<i>Changed annual emergency exercise to biennial and added that on non exercise years at least one drill involving some of the principal functional areas of emergency response be conducted. Changes made to comply with revised 10CFR50 Appendix E.</i>	<i>Annual drills and biennial exercise will still allow emergency responders to remain familiar with their emergency roles. These changes implement 10CFR50 Appendix E as revised 7/15/96. Therefore, the effectiveness of the Plan is not reduced and the planning standards continue to be met.</i>
Figure B-1/B-15	Replaced Nuclear Generation Organization chart with reference to UFSAR Fig. 13.1-2.	Figure 13.1-2 of UFSAR is the Nuclear Generation Organization. This figure is updated prior to making organizational changes that impact it. It is redundant to have the same figure in the RERP Plan. 10CFR50 App. E requires the plan to contain a description of the normal operating organization. Therefore, the effectiveness of the plan is not reduced and the planning standard continues to be met.

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G.1/G-1	<i>Clarified that information be provided to the public annually, but not necessarily via mail or telephone directory inserts.</i>	<i>The section as changed still will ensure information is provided to the public annually. 10CFR 50.47 requires that emergency response information be provided to the public on a periodic basis, with no stipulation as to the means employed. Therefore, the effectiveness of the Plan is not reduced and the planning standard continues to be met.</i>

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**RADIOLOGICAL EMERGENCY  
RESPONSE PREPAREDNESS PLAN**