

Detroit  
Edison

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January 30, 1997  
NRC-97-0002

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 to NRC, "Proposed Technical Specification Change (License Amendment) - Emergency Diesel Generator Action Statements, Surveillance Requirements and Reports," NRC-95-0124, dated November 22, 1995
  - 3) Detroit Edison Letter to NRC, "Response to Questions on Proposed Emergency Diesel Generator Technical Specification Change," NRC-96-0008, dated February 19, 1996
  - 4) Detroit Edison Letter to NRC, "Response to NRC Letter on Emergency Diesel Generator Allowed Outage Time Extension (TAC No. M94171)," NRC-96-0041, dated April 19, 1996
  - 5) Detroit Edison Letter to NRC, "Response to Probabilistic Safety Assessment Questions Related to Request for Increasing Emergency Diesel Generator Allowed Out of Service Time (TAC No. M94171)," NRC-96-0050, dated May 3, 1996
  - 6) Detroit Edison Letter to NRC, "Response to Questions on Combustion Turbine Generator (CTG) 11 Unit Number 1 Reliability and System Refurbishment (TAC No. M94171)," NRC-96-0066, dated June 12, 1996

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- 7) Detroit Edison Letter to NRC, "Revised Proposed Technical Specification Change (License Amendment) - Emergency Diesel Generator Action Statements, Surveillance Requirements and Reports (TAC No. M94171)," NRC-96-0069, dated June 21, 1996
- 8) NRC Letter to Detroit Edison, "Request for Additional Information Related to the Amendment to Extend Emergency Diesel Generator Allowed Outage Times at Fermi 2 (TAC No. M94171)," dated November 5, 1996
- 9) Detroit Edison Letter to NRC, "Additional Information Related to the License Amendment to Extend Emergency Diesel Generator Allowed Outage Times at Fermi 2 (TAC No. M94171)," NRC-96-0133, dated December 4, 1996

Subject: Combustion Turbine Generator (CTG) 11-1 Revised License  
Amendment to Extend Emergency Diesel Generator Allowed Outage  
Times at Fermi 2 (TAC No. 94171)

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On November 22, 1995, Detroit Edison submitted Reference 2 which proposed to amend Operating License NPF-43 for the Fermi 2 plant. Specifically, it was proposed to change the allowed out-of-service time (AOT) for one onsite AC electrical power division from the current 72 hours to 7 days. Reference 2 also included changes to incorporate improvements described in Generic Letter (GL) 94-01 which were subsequently issued as Amendment 107. As a result of discussions with the Fermi 2 NRR Project Manager Reference 2 is being revised by this submittal as described below.

In References 3 through 6, and most recently in Reference 9, Detroit Edison responded to a number of questions from the NRC staff concerning this amendment request.

Also, in responding to these questions Detroit Edison committed in Reference 4 to verify by an administrative check that the Alternate AC source (AAC) would be functional before removing an EDG from service for a planned extended period. The NRC subsequently requested that this commitment be included in the proposed Technical Specifications (TS). This letter, therefore, revises the original amendment request to include a check of the AAC source when the Action Statement for EDG TS 3.8.1.1 is entered.

In Reference 7, Detroit Edison modified the original request by revising the proposed Action Statements for TS 3.8.1.1. That submittal also deleted references to

evaluations that were performed using the Fermi 2 Probabalistic Safety Assessment (PSA) model. These changes were made in order to permit the NRC review to continue without relying on the PSA results which Detroit Edison did not consider essential to justify the requested changes. Detroit Edison now understands, however, that the NRC is proceeding with the review of the original request. The submittal made by Reference 7 therefore is being withdrawn by this letter and should no longer be considered in the review of this amendment request.

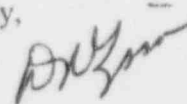
The final change being made by this letter is to modify the EDG Action Statements proposed by Reference 2 to make the extension of the AOT from 72 hours to 7 days contingent on the operability of CTG 11-1 as requested by the NRC staff. If CTG 11-1 is not operable, the AOT would revert back to 72 hours consistent with the current Technical Specifications.

Detroit Edison has evaluated the changes proposed by this submittal and has determined that the Significant Hazards evaluation provided with Reference 2 does not require revision. The determination that the proposed changes involve No Significant Hazards Consideration is not affected because the changes made by this submittal provide even further assurance that CTG 11-1 would be operable during the time that an EDG is out of service for extended maintenance. The risk as discussed in Reference 2, therefore, would be reduced.

Attachment 1 contains the proposed Technical Specification page revisions. These page revisions reflect the changes to TS 3.8.1.1 described above and corresponding changes to the Bases. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specifications and concurs with the changes made by this submittal.

If there are any questions concerning this submittal please contact Robert A. Newkirk at (313) 586-4211.

Sincerely,



Attachment

cc: A. B. Beach  
M. J. Jordan  
A. J. Kugler  
A. Vogel