

**Detroit
Edison**

B. Ralph Sylvia
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March 28, 1988
NRC-88-0028

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

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

Subject: Proposed Technical Specification (License Amendment)
Change - Radioactive Effluent Monitoring Instrumentation
(3/4.3.7.11, 3/4.3.7.12 and 6.9.1.8)

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed changes into Technical Specifications 3/4.3.7.11 Radioactive Liquid Effluent Monitoring Instrumentation, 3/4.3.7.12 Radioactive Gaseous Effluent Monitoring Instrumentation and 6.9.1.8 Semi-annual Radioactive Effluent Release Report. The proposed change modifies the ACTION and TABLE NOTATIONS of the affected Technical Specifications to allow continued use of release pathways for which effluent monitoring instruments may not be operable provided that grab samples and analyses and/or flow rate calculations are made at the specified frequencies. The proposed change also clarifies the reporting requirements consistent with the changes requested in 3/4.3.7.11 and 3/4.3.7.12.

Detroit Edison has evaluated the proposed Technical Specifications against the criteria of 10CFR50.92 and determined that no significant hazards consideration is involved. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed these proposed Technical Specification changes and concurs with the enclosed determinations.

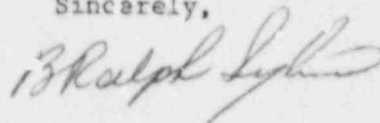
Pursuant to 10CFR170.12(c) enclosed with this amendment is a check for one hundred fifty dollars (\$150.00). In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

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If you have any questions, please contact Mr. Glen Ohlemacher at (313) 586-4275.

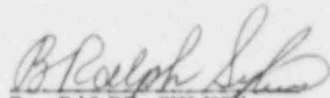
Sincerely,

A handwritten signature in cursive script, appearing to read "Ralph Lytle".

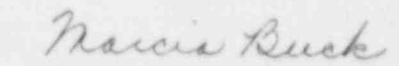
Enclosure

cc: Mr. A. B. Davis
Mr. R. C. Knob
Mr. T. R. Quay
Mr. W. G. Rogers
Supervisor, Advanced Planning and Review Section,
Michigan Public Service Commission

I, B. RALPH SYLVIA, 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.


B. RALPH SYLVIA
Group Vice President

On this 28th day of March, 1988, before me personally appeared B. Ralph Sylvia, being first duly sworn and says that he executed the foregoing as his free act and deed.


Notary Public
MARCIA BUCK
Notary Public, Washtenaw County, MI
My Commission Expires Jan. 11, 1992

*Acting in
Monroe County, Mich*

BACKGROUND/DISCUSSION

Technical Specifications 3/4.3.7.11 - Radioactive Liquid Effluent Monitoring Instrumentation and 3/4.3.7.12 - Radioactive Gaseous Effluent Monitoring Instrumentation, currently require termination of all releases, via a pathway for which an effluent monitor is inoperable, after 30 days or 14 days as appropriate... regardless of any sampling, analysis, or calculational capabilities available at that time. The proposed change modifies the ACTION and TABLE NOTATIONS of the affected Technical Specifications to allow continued use of release pathways for which primary effluent monitoring instruments may not be operable provided that grab samples and analyses and/or flow rate calculations are made at the specified frequencies. Technical Specification 6.9.1.8 Semi-annual Effluent Release Report is modified to reflect the reporting requirements of inoperable radioactive effluent monitoring instrumentation consistent with 3/4.3.7.11, 3/4.3.7.12 and 3/4.11.1.4.

The specific wording contained in the Fermi 2 Technical Specifications is presently written and interpreted to require termination of all releases, via a pathway for which an effluent monitor is inoperable, after 30 days or 14 days as appropriate... regardless of / sampling, analysis, or calculational capabilities available at that time. This requirement, in most cases, will necessitate a plant shutdown.

The Fermi 2 Technical Specification 3/4.3.7.11 and 3/4.3.7.12 were, in part, based upon NUREG-0473, "Standard Radiological Effluent Technical Specifications for BWRs," Revision 1 (Standard RETS). However, subsequent to the issuance of the Fermi 2 Facility Operating License, the NRC staff clarified the intent of the RETS, namely, that alternative monitoring techniques may be used, with no restricted time limitations, to assess the effluents should the primary monitoring means not be available. The RETS 30-day requirement is only intended as a reporting requirement for inoperable instrumentation. Additionally, Technical Specification 3/4.3.7.11 and 3/4.3.7.12 contain exclusions from the applicability of Specifications 3.0.3 and 3.0.4. This also indicates an intention not to require a plant shutdown for situations covered by these compensatory actions. The staff guidance has been reflected in the Technical Specifications of recently licensed plants and by the amendment process for several operating plants. The changes proposed, herein, are consistent with the Standard RETS and are consistent with comparable Technical Specifications that are approved at other similar plants.

The wording contained in ACTION a. of Technical Specifications 3/4.3.7.11 and 3/4.3.7.12 is being modified consistent with NUREG-0473, Rev. 2. The change provides an additional compensatory

action to change an instrument channel alarm/trip to an acceptably conservative setpoint when found to be less conservative than that required by the Technical Specifications. The proposed change to reflect the Standard RETS wording continues to ensure that the limits of Technical Specification 3/4.11.1.1 and 3/4.11.2.1 are not exceeded. The wording in ACTION 111 and ACTION 121 is also being modified consistent with NUREG-0473, Rev. 2. The change provides for the collection of grab samples "at least once per 12 hours." The proposed change to reflect the Standard RETS wording continues to ensure that grab samples are collected and analyzed on a periodic basis as an alternate means when primary instrumentation is inoperable.

SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10CFR50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards considerations. To make this determination, Detroit Edison must establish that operation in accordance with the proposed amendment would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated, or 2) create the possibility of a new or different kind of accident from any accident previously evaluated, or, 3) involve a significant reduction in a margin of safety.

- 1) The proposed changes to modify the radiological effluent monitoring instrumentation Technical Specifications does not involve a significant increase in the probability or consequences of an accident previously evaluated. The changes allow the continued use of an effluent pathway utilizing alternative monitoring techniques should the primary means not be available. This is consistent with the Standard Radiological Effluent Technical Specifications (NUREG-0473). Present wording of the Fermi 2 Technical Specifications allow continued use of the affected pathway for only up to 30 days (or 14 days as applicable) if prescribed sampling and analysis are performed. Allowing continued use of the affected pathway beyond 30 days (or 14 days as applicable) will not significantly increase the probability or consequences of an accident previously evaluated since prescribed sampling and analysis of any discharges via that pathway would be continued while the primary monitoring instrumentation is inoperable. The changes to the ACTION statements will not significantly increase the probability or consequences of an accident previously evaluated because the change ensures that grab samples are collected and analyzed on a periodic basis as an alternate means when primary instrumentation is inoperable. The change to ACTION a. to allow the establishment of a conservative

setpoint ensures that the limits of Technical Specification 3/4.11.1.1 and 3/4.11.2.1 are not exceeded.

- 2) The proposed changes to modify the radiological effluent monitoring instrumentation Technical Specifications does not create the possibility of a new or different kind of accident from any accident previously evaluated. As in 1) above, this change modifies the Technical Specification consistent with the Standard Radiological Effluent Technical Specification (NUREG-0473). The requested change does not result in any modifications to the plant or system operation and no safety-related equipment or function is altered. The requested change does not create any new accident mode.
- 3) The proposed changes to modify the radiological effluent monitoring instrumentation Technical Specifications does not involve a significant reduction in a margin of safety. While there may be some reduction in the plant's ability to make continuous, instantaneous evaluations of discharge levels with a monitoring instrument inoperable beyond the present 30-day (or 14-day as applicable) limit, there are sampling and calculational methods available for making those determinations which provide adequate assurance that no margin of safety is significantly reduced.

Based on the above reasoning, Detroit Edison has determined that the proposed amendment does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT

Detroit Edison has reviewed the proposed Technical Specification changes against the criteria of 10CFR⁵¹.22 for environmental considerations. As shown above, the proposed change does not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed Technical Specifications do meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

CONCLUSION

Based on the evaluation above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be

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conducted in compliance with the Commission's regulations and proposed amendments will not be inimical to the common defense and security or to the health and safety of the public.

The changes requested herein are consistent with the NRC's Standard Radiological Effluent Technical Specification (NUREG-0473) and with comparable Technical Specifications that are approved at other similar plants.

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PROPOSED PAGE CHANGES