

B. Ralph Sylvia
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**Detroit
Edison**

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January 26, 1988
NRC-87-0202

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: Proposed Technical Specification (License Amendment)
Change - Onsite Power Distribution Systems - Operating
and Shutdown (3/4.8.3.1 and 3/4.8.3.2)

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 Specification 3/4.8.3.1 Onsite Power Distribution Systems - Operating and 3/4.8.3.2 Onsite Power Distribution Systems - Shutdown. The proposed change clarifies the Limiting Condition for Operation of the 480v MCC 72CF swing bus.

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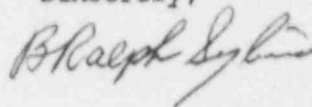
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If you have any questions, please contact Mr. Glen Ohlemacher at (313) 586-4275.

Sincerely,

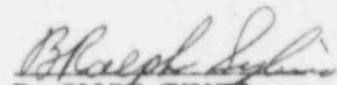


Enclosure


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

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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 26th day of January, 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

KAREN M. REED
Notary Public, Monroe County, Mich.
My Commission Expires May 14, 1990

BACKGROUND/DISCUSSION

The Limiting Condition of Operation (LCO) for Specification 3/4.8.3.1 and 3/4.8.3.2 currently does not specifically denote the 480v MCC 72CF swing bus tested in the corresponding surveillance requirements. The proposed change would add clarifying statements to the Technical Specifications to specifically denote the operability requirement of the swing bus. The proposed change also includes additional surveillances to ensure swing bus operability that are not presently included in the Technical Specifications.

On September 8, 1987, Detroit Edison identified a condition where the loss of d.c. power to the 480v MCC 72CF swing bus, which powers the low pressure coolant injection (LPCI) system loop selection/injection valves, resulted in the loss of this emergency core cooling system (ECCS) capability. This event is documented in Licensee Event Report No. 87-045 dated October 8, 1987. A review of the Technical Specifications was performed prior to implementing a modification to correct the identified design deficiency. Although the modification did not affect the Technical Specifications, several editorial inconsistencies with Technical Specification 3/4.8.3.1 and 3/4.8.3.2 were identified at that time and are addressed herein.

The proposed change provides a clarification to the Technical Specifications that would explicitly denote the operability requirement of the swing bus. The swing bus automatic throwover has, in the past, been acceptable for determining operability of the swing bus and been demonstrated in accordance with Surveillance Requirements 4.8.3.1.2 and 4.8.3.2.2. However, the current LCO describes in detail only the Division I and Division II a.c. power and d.c. power distribution systems and makes no mention of the swing bus which powers the LPCI system loop select/injection valves. The 480v MCC 72CF swing bus is the only transferable bus utilized at the plant to support ECCS equipment and the only power bus that interfaces with both divisional Engineered Safety Feature power sources. The swing bus is normally energized from Division I but is energized from Division II upon loss of its normal feed. Without the swing bus energized to provide a.c. power to the LPCI system loop selection/injection valves, the two redundant divisions of LPCI would be non-functional. For this reason, swing bus operability has always been an implicit operability requirement of Specification 3/4.8.3.1 and 3/4.8.3.2. To correct the inconsistency that exists between the surveillance requirement and the LCO several clarifications were added to the LCO and ACTION statements to explicitly denote swing bus operability.

The ACTION requirements specified for de-energization of the swing bus or inoperability of the swing bus automatic throwover scheme are to follow the appropriate ACTION requirements specified for the LPCI system subsystems made inoperable. In operational conditions 1, 2 and 3 both LPCI system subsystems operation are potentially compromised, thus the appropriate ACTION from Specification 3.5.1 is taken. This ACTION requires placing the unit in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. In other operational conditions, Specification 3.5.2 provides the ACTION requirements for the inoperabilities created by a de-energized swing bus.

In addition to these clarification statements, Detroit Edison is providing additional surveillances not presently included in the Technical Specifications. The additional surveillances are included in Specification 4.8.3.1.1 and 4.8.3.2.1 whereby the swing bus is "determined energized at least once per 7 days by verifying correct breaker alignment and voltage on the buses/cabinets." These additional surveillances were added to ensure swing bus operability and to ensure that the swing bus maintains the highest level of availability and reliability during its required operation.

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.

- A) The proposed change to add clarifying statements to explicitly denote the operability requirement of the 480v MCC 72CF swing bus:
- 1) Does not involve a significant increase in the probability or consequences of an accident previously evaluated. The changes to specifically denote the operability requirement of the 480v MCC 72CF swing bus are clarifications only and are added to achieve consistency between the Limiting Condition of Operation and the corresponding surveillance requirement and to achieve consistency throughout the Technical Specifications. The changes only explicitly denote the requirements which have always been implicit to the operability of the swing bus and are considered not to involve a significant hazards

consideration. As such, they meet Example (i) of amendments that are considered not likely to involve Significant Hazards Considerations (51 FR 7751). In addition, these changes do not result in any modification to the plant or system operation and no safety-related equipment or function will be altered.

- 2) Does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in 1) above, these are editorial clarifications only and are added for consistency. These changes do not result in any modification to the plant or system operation and no safety-related equipment or function will be altered. The requested change does not create any new accident mode.
- 3) Does not involve a significant reduction in a margin of safety. As stated in 1) above, these are editorial clarifications only and are added for consistency. Moreover, the change will clarify for the operators, specific actions which have in the past been implicit in the Technical Specifications.

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

- B) The proposed change to include additional surveillances for the swing bus which are not presently included in the Technical Specifications:
- 1) Does not involve a significant increase in the probability or consequences of an accident previously evaluated. The changes to include additional surveillances were added to ensure that the swing bus maintains the highest level of availability and reliability during its required operation. The changes constitutes additional limitations to ensure swing bus operability that are not presently included in the Technical Specifications (e.g., a more stringent surveillance requirement) and are considered not to involve a significant hazards consideration. As such, they meet Example (ii) of amendments that are considered not likely to involve Significant Hazards Considerations (51 FR 7751). In addition, these changes do not result in any modification to the plant or system operation and no safety-related equipment or function will be altered.
 - 2) Does not create the possibility of a new or different kind of accident from any accident previously evaluated. As in 1)

above, these are changes that constitute additional limitations to ensure swing bus operability that are not presently included in the Technical Specifications. These changes do not result in any modification to the plant or system operation and no safety-related equipment or function will be altered. The requested change does not create any new accident mode.

- 3) Does not involve a significant reduction in a margin of safety. In fact the margin of safety has been increased by the additional limitations to ensure swing bus operability.

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 changes do 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 evaluations 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 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 either editorial clarifications or additional surveillance requirements regarding the operability of the 480v MCC 72CF swing bus. The changes have been determined not to involve a Significant Hazards Consideration as they meet either Example (i) or Example (ii) of amendments that are considered not likely to involve Significant Hazards Considerations (51 FR 7751).

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PROPOSED PAGE CHANGES