

**Detroit  
Edison**

B. Ralph Sylvia  
Group Vice President

6400 North Dixie Highway  
Newport, Michigan 48166  
(313) 586-4150

January 26, 1988  
NRC-87-0248

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 Change (License  
Amendment) - Primary Containment (3/4.6.1) and Secondary  
Containment (3/4.6.5)

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed change into the Plant Technical Specifications.

The proposed change allows closure mechanisms for primary and secondary containment penetrations which are located in locked high radiation areas to be verified closed each Cold Shutdown (if not performed within the previous 31 days) rather than every 31 days. Additionally, the proposed revision clarifies that the primary containment penetrations located in locked areas which remain high radiation areas during the Cold Shutdown may be verified by review of high radiation area access controls. This proposed change implements the ALARA (As Low As Reasonably Achievable) philosophy while still giving assurance that containment integrity is being maintained.

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 the proposed Technical Specifications and concurs with the enclosed determinations.

Pursuant to 10CFR170.12(c), enclosed with this amendment request is a check for one hundred fifty dollars (\$150.00).

8801270352 880126  
PDR ADOCK 05000341  
PDR

Rec'd w/ KMAC \$150.00  
# 850480

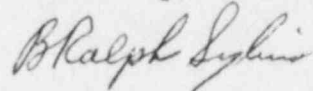
Ado!  
1/1

USNRC  
January 26, 1988  
NRC-87-0248  
Page 2

In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

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 Lykins".

Enclosure

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

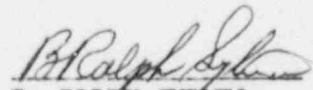
USNRC

January 26, 1988

NRC-87-0248

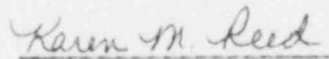
Page 3

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.  
Commission Expires May 14, 1990

## I. BACKGROUND/DISCUSSION

Fermi 2 Technical Specification 4.6.1.1.b provides a surveillance requirement to verify, at a frequency of at least once per 31 days, that all primary containment penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions are closed by locked closed valves, blank flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 of Specification 3.6.3. Inaccessibility of valves located in the containment is recognized by providing a decreased frequency for such valves. Specification 4.6.5.1.b.3 provides a similar 31-day surveillance requirement for secondary containment penetrations.

At Fermi 2 approximately thirty (30) items which fall under the verification requirement of Specifications 4.6.1.1.b or 4.6.5.1.b.3 are located in areas which are normally locked high radiation areas during reactor power operations. Access to these locked high radiation areas is controlled by an administrative program which requires control over and documentation for each entry.

Physical verification of each item located within a locked high radiation area during full power operation would result in an estimated occupational exposure of ten (10) man-rem each year. Detroit Edison believes that this exposure is excessive considering that the penetrations are located in locked areas to which entry is closely controlled.

The proposed specification would establish a verification frequency for such penetrations located in locked high radiation areas of each Cold Shutdown, if not performed within the previous 31 days, and allow penetrations located in locked areas which remain high radiation areas during the Cold Shutdown to be verified by review of high radiation area access controls. The latter provision covers the TIP (Transverse Incore Probe) Room, in the case of a short Cold Shutdown following use of the probes, since the room is temporarily inaccessible due to high radiation following probe use. The control over locked high radiation area entry greatly reduces the probability of any penetration being disturbed. The proposed surveillance frequency for penetrations located in locked high radiation areas could be considered as providing equivalent assurance of containment integrity as verification of normally accessible penetrations every 31 days.

Based on the reduction in dose that this change achieves, it is supported by the ALARA philosophy. Since this proposed revision still provides assurance of control over containment boundary valves, it is definitely reasonably achievable.

### **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 has established 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 change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The change provides an alternative frequency and means of verification of primary and secondary containment penetration isolation which still provides assurance that required conditions are being maintained.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The change does not add any new equipment, does not affect the operation of any of the systems, or alter any of the design assumptions previously evaluated.
3. The proposed change does not involve a significant reduction in a margin of safety. The proposed change only contains an alternative frequency and method of verifying a primary and secondary containment penetration isolation and thus results in an identical plant configuration with an unchanged margin of safety.

### **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 the proposed amendment will not be inimical to the common defense and security or to the health and safety of the public.

### **II. REVISED TECHNICAL SPECIFICATIONS**

The requested revision is attached.

### **III. 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 change the types or increase

Enclosure to  
NRC-87-0248  
Page 3

the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures.

The change reduces cumulative occupational radiation exposures while maintaining an equivalent assurance that containment integrity is being maintained.

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 requirements for an Environmental Impact Statement.

PROPOSED PAGE CHANGES