

B. Ralph Sylvia  
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**Detroit  
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April 11, 1988  
NRC-88-0108

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, NRC-88-0049,  
"Request for Temporary Exemption from 10CFR50  
Appendix J - Primary Containment Leakage Testing on  
the Residual Heat Removal Shutdown Cooling Inboard  
Isolation Valves", dated February 22, 1988
  - 3) Detroit Edison Letter to NRC, NRC-88-0031,  
"Proposed Technical Specification Change (License  
Amendment) Change - Primary Containment Isolation  
Valves (3/4.6.3)," dated February 10, 1988
  - 4) Detroit Edison Letter to NRC, NRC-88-0060,  
"Additional Information As Requested by the NRC",  
dated March 3, 1988

Subject: Proposed Emergency Technical Specification (License  
Amendment) Change - Primary Containment Leakage  
(3/4.6.1.2)

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Detroit Edison hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed changes into Technical Specification 3/4.6.1.2. The proposed change provides a one-time extension of the 24-month surveillance interval for Type C local leak rate testing (LLRT) of three Residual Heat Removal (RHR) shutdown cooling inboard isolation valves (E11-F009, E11-F408 and E11-F608). The request would extend the valves LLRT interval until the first refueling outage, currently scheduled for 1989.

Detroit Edison, in Reference 2, requested that the Type C interval requirements of 10CFR50, Appendix J be exempted for these valves until the first refueling outage. Supplemental information pertaining to this request was provided in Reference 4. During the final NRC review of the exemption request, it was determined that a Technical Specification change would be necessary to support the Appendix J exemption. Therefore, Detroit Edison is submitting this License Amendment request at this time.

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These valves become overdue for testing on April 28, 1988 following which power operation at Fermi 2 would be prohibited unless the valves were successfully tested. As described in Reference 2, and in this request, Detroit Edison believes that it is undesirable for these valves to be tested as currently required. Therefore, Detroit Edison requests that this request be processed under the provisions of 10CFR50.91(a)(5) as an emergency situation in which lack of timely action would unnecessarily extend a plant shutdown.

In Reference 3 Detroit Edison requested that the Type C testing requirements be removed from these valves. Continued NRC consideration of Reference 3 is requested.

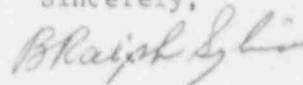
Detroit Edison has evaluated the proposed Technical Specification changes against the criteria of 10CFR50.92 and has determined that no significant hazards consideration is involved.

The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specification changes and concurs with the enclosed determinations.

Pursuant to 10CFR170.12(c), enclosed with this amendment is a check for one hundred and fifty dollars (\$150.00). Pursuant to 10CFR50.91(b)(1), the state of Michigan has been notified by a copy of this amendment request. Additionally, the Regional Administrator of Region III and the Senior Resident Inspector have been provided copies of this application. Your prompt attention to this application is appreciated.

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

Sincerely,

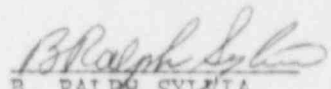


Enclosure

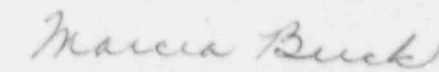
cc: Mr. A. B. Davis  
Mr. R. C. Knop  
Mr. T. R. Quay  
Mr. W. G. Rogers  
Supervisor, Advanced Planning and Review Section  
Michigan Public Service Commission

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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 11<sup>th</sup> day of April, 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, MI*

#### BACKGROUND/DISCUSSION

In early February 1988 Detroit Edison determined that performance of LLRT testing of three RHR Shutdown Cooling Inboard Isolation valves (E11-F009, E11-F408 and E11-F608) would be undesirable during the outage being planned for LLRT testing during March 1988. Detroit Edison's investigation determined that the Type C LLRT requirements should not apply to valves in question and an appropriate Technical Specification change was submitted (Reference 3).

Initial NRC review of Reference 3 determined that the request could not be dispositioned in time to support the requirements of the March 1988 outage. Consequently, Detroit Edison submitted a request to exempt the valves from Type C testing until the first refueling outage (Reference 2). Final NRC review of the proposed exemption determined that a Technical Specification change was also necessary.

In Reference 2, Detroit Edison provided bases for extension of the LLRT interval for these valves until the first refueling outage currently scheduled for 1989. The following summarizes this basis:

- 1) None of the valves in question have been exposed to a significant operating environment. As the underlying purpose of the regulation is to ensure testing after two years in an operating environment, the request did not conflict with this intent.
- 2) The request had compensating benefits to the public health and safety as performance of the testing as required necessitates reliance solely on alternate means of decay heat removal.

These bases for the requested exemption to Appendix J requirements also support this proposed change to Technical Specifications. Detroit Edison has also provided, in References 2 and 4, detailed technical information which supports the proposal.

Detroit Edison believes that reliance solely upon alternate means of decay heat removal should be minimized particularly in this case where the intent of the regulations do not require such reliance. Therefore, prompt approval of this proposal is requested. The proposed page change is attached.

#### SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10CFR50.92, Detroit Edison 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.

The proposed change to extend the Type C testing frequency of the RHR Shutdown Cooling Inboard Isolation valves (E11-F009, E11-F408 and E11-F608) to the first refueling outage:

- 1) Does not involve a significant increase in the probability or consequences of an accident previously evaluated. The change is consistent with the intent of the original testing frequency to test the valves following one operating cycle of power operation. Thus, the change maintains equivalent assurance that the valve leakage is within assumed values.
- 2) Does not create the possibility of a new or different kind of accident from any accident previously evaluated. No changes in plant design or operation are made. No new accident modes are created.
- 3) Does not involve a significant reduction in a margin of safety. The change maintains the original intent of the specified testing frequency and, additionally, reduces reliance on alternate means of decay heat removal. Thus the margin of safety is maintained and possibly improved by this change.

#### 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 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.

#### BASIS FOR EMERGENCY CIRCUMSTANCES

As described above, Detroit Edison discovered the need for this relief from these testing requirements in early February 1988. Prompt action was then taken in the form of the requests of Reference 2 and following discussions with the NRC staff, Reference 3. The NRC staff informed Detroit Edison of the need for this Technical Specification change on April 7, 1988. Thus, Detroit Edison believes that prompt action has been taken and that these emergency circumstances could not have been reasonably avoided.

Fermi 2 is currently shut down for LLRT testing and is scheduled to start up on April 20, 1988. Successful testing of these valves within the required frequency is required for PRIMARY CONTAINMENT INTEGRITY. Specification 3.6.1.1 requires prompt ACTION to place the plant in COLD SHUTDOWN if PRIMARY CONTAINMENT INTEGRITY is not maintained. Power operation beyond April 28, 1988 is contingent upon resolution of the testing of these valves.

Based on the above, Detroit Edison concludes that this request represents emergency circumstances as described in 10CFR50.91(a)(5).

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

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PROPOSED PAGE CHANGE