



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

June 24, 2020

EA-19-097

Mr. Peter Dietrich
Chief Nuclear Officer
DTE Energy Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: REVISION TO CONFIRMATORY ACTION LETTER-FERMI POWER PLANT,
UNIT 2 COMMITMENT TO ADDRESS DEGRADED TORUS COATINGS

Dear Mr. Dietrich:

On October 4, 2019, the U.S. Nuclear Regulatory Commission (NRC) issued Confirmatory Action Letter EA-19-097 confirming DTE Energy Company's commitment to mitigate the degraded torus coating at Fermi 2 by removing all coating in the submerged portion of the torus, including the torus internals, and applying a qualified coating capable of withstanding design basis accident conditions (Agencywide Documents Access and Management System (ADAMS) Accession Number ML19280D881). The Confirmatory Action Letter was issued based upon information reviewed as part of a 2019 NRC Design Basis Assurance Inspection (ML19211B289) and an NRC Special Inspection (ML20031D253).

On March 13, 2020, the NRC received a letter from DTE Energy Company notifying the Agency of a change to DTE's commitment and providing clarifying information supporting the commitment change (ML20073N414). Specifically, DTE Energy Company committed to complete the following action:

- DTE commits to mitigate the degraded coating in the submerged portion of the torus by removing all coating in the submerged portion of the torus and applying a qualified coating capable of withstanding design basis accident conditions. Removal of coating and application of qualified coating will also be performed for the torus internals in the submerged portion of the torus with the exception of the internal surfaces of the submerged portion of the downcomers and the internal surfaces of the process piping. The internal surfaces of the submerged portion of the downcomers and the coated internal surfaces of the submerged portion of the process piping will be inspected and degraded coating, if any, will be removed during the next refueling outage. This DTE commitment will be completed prior to resuming power operation following the next refueling outage; the next refueling outage will begin no later than April 30, 2020.

The NRC independently reviewed the information provided by DTE Energy Company in their March 13, 2020 letter and issued a revised Confirmatory Action Letter on March 27, 2020 (ML20087L769).

On June 19, 2020, the NRC received an additional letter from DTE Energy Company regarding the need to further clarify the above commitment (ML20171A600). This need is based upon conditions discovered by DTE Energy Company during the torus coating mitigation activities. Specifically, DTE Energy Company identified some stainless-steel components in the submerged portion of the torus which were previously coated. Because stainless-steel components are not required to be coated for corrosion protection, DTE Energy Company informed the NRC of their plans to leave these stainless-steel components uncoated. During the torus coating removal process, DTE Energy Company also identified small areas where previously applied coatings were unable to be removed using pressure washing and sand blasting measures. The total amount of coating unable to be removed is estimated to be less than 0.01 percent of the total coated surface area in the submerged portion of the torus. The licensee planned to account for this small amount of coatings as part of their emergency core cooling system (ECCS) suction strainer margin calculation. Based upon these newly identified conditions, DTE Energy Company commits to complete the following revised action:

- DTE commits to mitigate the degraded coating in the submerged portion of the torus by removing all coating (i.e., to the extent possible) in the submerged portion of the torus and applying a qualified coating capable of withstanding design basis accident conditions. Removal of coating and application of qualified coating will also be performed for torus internals in the submerged portion of the torus with the exception of the internal surfaces of the downcomers and the internal surfaces of process piping. The internal surfaces of the submerged portion of the downcomers and the coated internal surfaces of the submerged portion of process piping will be inspected and degraded coating, if any, will be removed during the next refueling outage. Torus internals that do not require protective coating to perform their intended function may be left uncoated. Following completion of these activities, unqualified coatings in the submerged portion of the torus will be explicitly addressed for potential impact on ECCS strainers in the same manner as other unqualified coatings in primary containment. This DTE commitment will be completed prior to resuming power operation following the next refueling outage. The next refueling outage will begin no later than April 30, 2020.

The NRC finds DTE Energy Company's plan to leave stainless-steel components in the submerged portion of the torus uncoated to be acceptable since the coating is not required for corrosion protection. The NRC plans to independently review the amount of unqualified coatings in the submerged portion of the torus and the potential impact on the ECCS suction strainers as part of our ongoing Confirmatory Action Letter Closure Inspection.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

1. Notify me immediately, in writing, if your understanding differs from that set forth above;
2. Notify me, in writing, if for any reason you cannot complete the actions within the specified schedule and advise me, in writing, of your modified schedule in advance of the change;
3. Notify me, in writing, if for any reason you intend to change, deviate from or not complete any of the documented commitments set forth above, and advise me, in writing, of the changes or deviations; and

4. Notify me, in writing, when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not modify or amend the DTE Fermi Nuclear Power Plant license and does not preclude issuance of an Order making the above commitments legally binding requirements or requiring other actions on the part of the licensee. In addition, the NRC is not precluded from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice and Procedure," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, security-related or safeguards information, so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by Title 10 of the *Code of Federal Regulations* 2.390(b) to support a request for withholding confidential commercial or financial information).

If you have any questions concerning this matter, please contact Karla Stoedter of my staff. Ms. Stoedter can be reached at 630-829-9731.

Sincerely,

/RA/

John B. Giessner
Regional Administrator

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cc: Distribution via LISTSERV®

Letter to Peter Dietrich from John B. Giessner dated June 24, 2020.

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