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May 28, 2021  
NRC-21-0033

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Fermi 2 Power Plant  
NRC Docket No. 50-341  
NRC License No. NPF-43

Subject: Notification of Schedule Change for Fermi 2 Commitment Regarding  
Severe Accident Management Guidelines

- References:
- 1) DTE Letter NRC-15-0101, "Commitment to Maintain Severe Accident Management Guidelines," dated December 2, 2015 (ML15350A104)
  - 2) NRC Letter, "Reactor Oversight Process Changes to Address Severe Accident Management Guidelines," dated February 23, 2016 (ML16032A029)
  - 3) NRC Letter, "Fermi, Unit 2 – Documentation of the Completion of Required Actions Taken in Response to the Lessons Learned from the Fukushima Dai-ichi Accident," dated August 14, 2020 (ML20217L633)
  - 4) DTE Letter NRC-21-0002, "Submittal of Revision 23 to the Fermi 2 Updated Final Safety Analysis Report (UFSAR), 10 CFR 50.59 and 10 CFR 72.48 Evaluation Summary Reports, Commitment Management Report, Revisions to the Technical Requirements Manual and the Technical Specifications Bases, and a Summary of the Excessive Detail Removed from the UFSAR," dated February 2, 2021

In Reference 1, DTE Electric Company (DTE) made commitments to the NRC regarding the implementation and maintenance of Severe Accident Management Guidelines (SAMGs). These commitments were acknowledged by the NRC in Reference 2 and utilized by the NRC when confirming closure of required actions in Reference 3. In Reference 4, DTE notified the NRC that the wording of one of the commitments had been changed to remove a reference to a Nuclear Energy Institute (NEI) document that was no longer required.

The Reference 1 commitment, as modified by Reference 4, states that DTE would update the site SAMGs to future revisions of the BWROG generic SAMGs within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater. A revision to the BWROG generic SAMGs was published on June 1, 2018. Due to the Fermi 2 refueling outage schedule,

the greater of the two dates in this case is May 31, 2021. Therefore, DTE is currently committed to implement the revision to the SAMGs by May 31, 2021.

As of the date of this letter, DTE has completed the necessary implementation of two of the six volumes. For the remaining four volumes, the necessary changes have been prepared and are under verification and review by plant personnel. Due to emergent issues and a recently identified potential additional change involving spent fuel pool level, it is unlikely that the remaining four volumes will be formally implemented prior to the May 31, 2021 date associated with the Reference 1 commitment. Instead, DTE expects to complete implementation of the remaining four volumes by December 31, 2021. This issue has been entered into the Fermi 2 Corrective Action Program.

Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," provides guidance for changing or modifying commitments. This NEI 99-04 guidance has been incorporated into Fermi 2 procedures. In accordance with NEI 99-04, and the associated Fermi 2 procedures, this letter notifies the NRC that DTE is making a schedule change to the Reference 1 commitment. This notification is being provided in advance of the original May 31, 2021 commitment date. Following completion of the in-progress SAMG revision, future SAMG revisions will be performed per the original Reference 1 commitment schedule.

During the period of extension, existing site procedures will still provide the necessary actions to respond to postulated severe accidents.

In summary, DTE is revising the Reference 1 commitment, as modified by Reference 4, to state the following (revisions italicized):

DTE will update site SAMGs to future revisions of the BWROG generic SAMGs within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater, *with the exception that the update associated with Revision 4 of the BWROG generic SAMGs will be completed by December 31, 2021 rather than May 31, 2021.*

Should you have any questions or require additional information, please contact Ms. Margaret M. Offerle, Manager – Nuclear Licensing, at (734) 586-5076.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Dietrich", with a stylized, overlapping loop at the end.

Peter Dietrich  
Senior Vice President and Chief Nuclear Officer

cc: NRC Project Manager  
NRC Resident Office  
Regional Administrator, Region III