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**DTE Energy**



10 CFR 2.202

August 26, 2013  
NRC-13-0044

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

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) NRC Order EA-12-049, "Order to Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
  - 3) NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis Events," Revision 0, dated August 29, 2012
  - 4) NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
  - 5) DTE Electric Company letter, NRC-12-0061, "Detroit Edison's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 19, 2012
  - 6) DTE Electric Company letter, NRC-13-0009, "DTE Electric Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 28, 2013

Subject: DTE Electric Company's First Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 2) to DTE Electric Company (DTE). Reference 2 was immediately effective and directed DTE to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-bases external event. Specific requirements are provided in Attachment 2 of Reference 2.

Reference 2 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 3) and an overall integrated plan pursuant to Section IV, Condition C. Reference 3 endorses industry guidance document NEI 12-06, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 3. Reference 5 provided the DTE initial status report regarding mitigation strategies. Reference 6 provided the DTE overall integrated plan.

Reference 2 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 4 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 2, that delineates progress made in implementing the requirements of Reference 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact Mr. Kirk R. Snyder, Manager, Industry Interface at (734) 586-5020.


Sincerely,



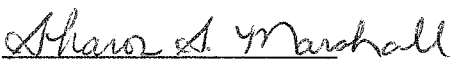
ACTING SUP FOR J.T. CONNER

cc: Director, Office of Nuclear Reactor Regulation  
NRC Project Manager  
NRC Resident Office  
Reactor Projects Chief, Branch 5, Region III  
Regional Administrator, Region III  
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC  
Supervisor, Electric Operators,  
Michigan Public Service Commission

I, Kent C. Scott, 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.

  
\_\_\_\_\_  
Kent C. Scott  
Director, Nuclear Production  
Nuclear Generation

On this 26<sup>th</sup> day of August, 2013 before me personally appeared Kent C. Scott, being first duly sworn and says that he executed the foregoing as his free act and deed.

  
\_\_\_\_\_  
Notary Public

SHARON S. MARSHALL  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF MONROE  
MY COMMISSION EXPIRES Jun 14, 2019  
ACTING IN COUNTY OF *Monroe*

**Enclosure to  
NRC-13-0044**

**Fermi 2 NRC Docket No. 50-341  
Operating License No. NPF-43**

**DTE Electric Company's First Six Month Status Report for the  
Implementation of Order EA-12-051, Order Modifying Licenses with Regard  
to Requirements for Mitigation Strategies for Beyond-Design-Basis External  
Events**

**DTE Electric Company's First Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

**Introduction**

DTE Electric Company (DTE) developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**Milestone Accomplishments**

None

**Milestone Schedule Status**

The following provides an update to the milestone schedule to support the Overall Integrated Plan. This section provides the activity status of each item, and the expected completion date. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the order implementation date.

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
<b>Submit 6 Month Updates:</b>			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Not Started	
Update 3	Aug 2014	Not Started	
Update 4	Feb 2015	Not Started	
Update 5	Aug 2015	Not Started	
<b>FLEX Strategy Evaluation</b>			

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Walk through or Demonstrations	Aug 2016	Not Started	
Perform Staffing Analysis	Jul 2015	Not Started	
<b>Modifications:</b>			
Design Engineering	Apr 2014	In-progress	Dec 2014
Implementation Outage	Nov 2015	Not Started	
<b>Storage</b>			
Storage Design Engineering	Apr 2014	In-progress	Dec 2014
Storage Implementation	Nov 2015	Not Started	
<b>FLEX Equipment</b>			
Procure On-Site Equipment	Aug 2014	In-progress	
Develop Strategies with RRC	Oct 2013	In- progress	Nov 2014
Procure Staging Location	Dec 2013	In-progress	
<b>Procedures:</b>			
Create Procedures	Dec 2014	Not Started	
<b>Training:</b>			
Develop Training Plan	Jul 2015	Not Started	
Training Complete	Nov 2015	Not Started	
FLEX Implementation	Nov 2015	Not Started	
Submit Completion Report	Jan 2016	Not Started	

**Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

**Need for Relief/Relaxation and Basis for the Relief/Relaxation**

DTE expects to comply with the order implementation date and no relief/relaxation is required at this time.

### **Open Items from Overall Integrated Plan and Draft Safety Evaluation**

None

### **Potential Draft Safety Evaluation Impacts**

There are no potential impacts to the Draft Safety Evaluation identified at this time.

### **References**

The following references support the updates to the Overall Integrated Plan described in this enclosure:

1. DTE Electric's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," NRC-13-0009, dated February 28, 2013.
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.