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August 28, 2014  
NRC-14-0060

10 CFR 2.202

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, "Issuance of Order to Modify 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'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)," dated February 28, 2013

Subject: DTE Electric Company's Third 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 third 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. Enclosure 1 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2014



Vito Kaminskas  
Site Vice President

Enclosure

cc: Director, Office of Nuclear Reactor Regulation  
NRC Project Manager  
NRC Resident Office  
Reactor Projects Chief, Branch 5, Region III  
Regional Administrator, Region III  
Michigan Public Service Commission,  
Regulated Energy Division (kindschl@michigan.gov)

**Enclosure 1 to  
NRC-14-0060**

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

**DTE Electric Company's Third Six Month Status Report for the  
Implementation of Order EA-12-049, Order Modifying Licenses with Regard  
to Requirements for Mitigation Strategies for Beyond-Design-Basis External  
Events**

**DTE Electric Company's Third Six Month Status Report for the Implementation of Order  
 EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation  
 Strategies for Beyond-Design-Basis External Events**

**1. Introduction**

DTE Electric Company (DTE) developed an Overall Integrated Plan (OIP) (Reference 6), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the last six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2. Milestone Accomplishments**

None

**3. Milestone Schedule Status**

The following provides an update to the milestone schedule to support the Overall Integrated Plan. Target completion dates provided in this section include updates from previous six-month updates. 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 (Reference 5)	
Submit Overall Integrated Plan	Feb 2013	Complete (Reference 6)	
<b>Submit 6 Month Updates:</b>			
Update 1	Aug 2013	Complete (Reference 7)	
Update 2	Feb 2014	Complete (Reference 8)	
Update 3	Aug 2014	Complete	

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Update 4	Feb 2015	Not Started	
Update 5	Aug 2015	Not Started	
<b>FLEX Strategy Evaluation</b>			
Walk through or Demonstrations	Aug 2016	Not Started	
Perform Staffing Analysis	Jul 2015	Not Started	Apr 2015
<b>Modifications:</b>			
Design Engineering	Dec 2014	In-progress	
Implementation	Nov 2015	Started	
<b>Storage</b>			
Storage Design Engineering	Dec 2014	In-progress	
Storage Implementation	Nov 2015	Not Started	
<b>FLEX Equipment</b>			
Procure On-Site Equipment	Aug 2014	In-progress	Aug 2015
Develop Strategies with RRC	Feb 2015	In- progress	
Procure Staging Location	Apr 2015	In-progress	
<b>Procedures:</b>			
Create Procedures	Dec 2014	In-progress	
<b>Training:</b>			
Develop Training Plan	Jul 2015	Started	
Training Complete	Nov 2015	Not Started	
FLEX Implementation	Nov 2015	Started	
Submit Completion Report	Jan 2016	Not Started	

#### 4. Changes to Compliance Method

No changes in the compliance method for Fermi 2 have been made since the update provided in the last six-month update (Reference 8).

**5. 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.

**6. Open Items from Interim Staff Evaluation**

The following table provides a summary of the open items documented in the Interim Staff Evaluation (ISE) (Reference 9) and the status of each item.

ISE Open Item	Status
3.1.1.1.A. Each section of the Integrated Plan describing storage protection from hazards makes reference to Section 11 rather than to the specific protection requirements described in NEI 12-06 for the applicable hazard; that is Section 6.2.3.1 for floods, Section 7.3.1 for wind, etc.	As reported in Reference 8, the OIP has been revised to refer to the specific requirements of NEI 12-06
3.2.2.A Until the issue of relying on blow-away panels to prevent [over] pressurization of the RB-5 is provided there is no reasonable assurance that the plan will conform with NEI 12-06, Table C-3.	As reported in Reference 8, means to vent RB-5 have been added to the Fermi 2 strategy and the OIP has been revised accordingly.
3.2.3.B Revision 3 to the BWROG EPG SAG is a Generic Concern because the BWROG has not addressed the potential for the revised venting strategy to increase the likelihood of detrimental effects on containment response for events in which the venting strategy is invoked. [Note: For Fermi, containment venting is a backup plan to torus feed and bleed discussed above.]	As reported in Reference 8, the NRC generic concerns with the revised venting strategy contained in Revision 3 to the BWROG EPG SAG have been resolved. This venting strategy is being incorporated into the Fermi 2 Emergency Operating Procedures. At Fermi 2, use of containment venting is a back-up to the primary strategy.

**7. References**

1. Fermi 2  
 NRC Docket No. 50-341  
 NRC License No. NPF-43
2. NRC Order Number EA-12-049, "Issuance of Order to Modify 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-13-009, "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)," dated February 28, 2013
7. DTE Electric Company letter, NRC-13-0044, "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)," dated August 26, 2013
8. DTE Electric Company letter, NRC-14-0002, "DTE Electric Company's Second 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)," dated February 27, 2014
9. NRC Letter, "Fermi, Unit 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF0770), dated November 25, 2013