

Detroit Edison



10 CFR 50.92

March 8, 2000
NRC-00-0004

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison Letter to NRC, "Proposed Technical Specification Change (License Amendment)-Safety Limit-Minimum Critical Power Ratio (MCPR)", NRC-99-0100, dated December 17, 1999

Subject: Additional Information Regarding Proposed Technical Specification Change (License Amendment) - Safety Limit-Minimum Critical Power Ratio (MCPR)

On December 17, 1999, Detroit Edison proposed a License Amendment (Reference 2) to change the Minimum Critical Power Ratio (MCPR) Safety Limits in Technical Specification 2.1.1.2. A conference call regarding this proposed amendment was conducted on February 23, 2000 between NRC and Detroit Edison staffs. Based on this call, additional information for the Fermi 2 Cycle-8 Safety Limit MCPR calculation is being provided with this letter (Attachment 1). Some of the information contained in Attachment 1 is considered Global Nuclear Fuel (GNF) proprietary information and should be withheld from public disclosure in accordance with 10CFR9.17(a)(4) and 10CFR2.790(a)(4). An affidavit attesting to this fact is provided as Attachment 2. A non-proprietary version of the GNF document is provided as Attachment 3.

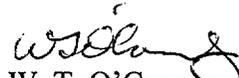
Detroit Edison has evaluated this additional information regarding the proposed Technical Specification change and has determined the Significant Hazards

change: NRC PDC
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Consideration provided with the proposed amendment is not affected by this additional information.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,



W. T. O'Connor, Jr.
Assistant Vice President
Nuclear Assessment

Attachments

cc: A. J. Kugler
M. A. Ring
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, WILLIAM T. O'CONNOR, JR., 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.


WILLIAM T. O'CONNOR, JR.
Assistant Vice President
Nuclear Assessment

On this Eight day of March, 2000 before me personally appeared William T. O'Connor, Jr., being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public
NORMAN K. PETERSON
Notary Public, Monroe County, MI
My Commission Expires July 24, 2002



**ATTACHMENT 3
To NRC-00-0004**

**GLOBAL NUCLEAR FUEL [GNF] DOCUMENT ENTITLED
ADDITIONAL INFORMATION REGARDING THE
CYCLE SPECIFIC SLMCPR FOR FERMI 2 CYCLE 8
[GNF NON-PROPRIETARY VERSION]**

Please identify power distribution uncertainties used for the proposed Fermi 2 Cycle 8 TS amendment. Also describe their impact on the calculated Safety Limit MCPR values and justify that the proposed SLMCPR values are conservative with respect to the evaluation stated in Section 4.3 of NEDC-32601P. Explanation why the values in Table 1 of the attachment 1 to NRC-99-0100 (letter comparing Cycle 7 and 8 SLMCPR values provided by GE to DECO) are unchanged between the GETAB and the actual Fermi core.

Table 1**Comparison of the Fermi-2 Cycle 8 and Cycle 7 SLMCPR**

The power distribution and other uncertainties that are the bases for the current TS safety limit for Fermi 2, Cycle 8 are identified in Table 2. Column 2 of Table 2 shows the power distribution and other uncertainties that are the bases for the current TS safety limit for Fermi 2, Cycle 7. The revised bases to support the proposed TS change in safety limit for Fermi 2, Cycle 8 are identified in column 3b of Table 2. The GETAB bases and values for Cycle 8 are provided for comparison purposes in column 3a. By comparing the values from columns 2 for Cycle 7 and column 3a for Cycle 8, one may see that at least part of the proposed Tech Spec reduction in SLMCPR is due to typical variations that are seen from cycle to cycle. In other words, the calculated SLMCPR for Fermi 2, Cycle 8 is lower than the value for Cycle 7 even when using the GETAB model and uncertainties for both calculations. Thus, the focus for Table 2 is on how the revised model and reduced power distribution uncertainties affect the calculated SLMCPR for Fermi 2, Cycle 8 (only).

Bases that have not changed are not reported in either table except where it is important to indicate that the bases have not changed. For these exceptions, the impact on the SLMPCR is indicated as "none" in the rightmost column of Table 2. For the other items where a change in basis is indicated, the calculated impact that each item has on the calculated SLMCPR is indicated.

The impacts from the changes in bases have been grouped into three categories. In each category the shaded cells contain values that sum to produce the total impact for that category indicated in the cell immediately below the shaded cells.

It is apparent that use of the NRC-approved revised uncertainties from NEDC-32601P-A results in a change in the calculated SLMCPRs.

Table 2
Fermi 2, Cycles 7 and 8

Prepared by:



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Fermi-2 Project