

February 20, 1990

Docket No. 50-341

Mr. B. Ralph Sylvia
Senior Vice President - Nuclear
Operations
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

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OGC	ARM/LFMB
DHagan	EJordan

Dear Mr. Sylvia:

SUBJECT: AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-43:
(TAC NO. 69835)

The Commission has issued the enclosed Amendment No. 51 to Facility Operating License No. NPF-43 for the Fermi-2 facility. This amendment consists of changes to the Plant Technical Specifications (TS) in response to your letter dated September 30, 1988.

The amendment revises the TS Section 3/4.7.1.5 for the Ultimate Heat Sink to better reflect the as-built conditions of the plant and the design basis. By letter dated December 15, 1989 the licensee also proposed changes to Section 3/4.7.1 of the bases to better reflect Surveillance Requirement 4.7.1.5.b.2.

A copy of the Safety Evaluation supporting this amendment is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by

John F. Stang, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 51 to NPF-43
2. Safety Evaluation

cc w/enclosures:
See next page

DOCUMENT NAME: FERMI AMEND 69835

*See previous concurrence

LA/PD31:DRSP*
PShuttleworth
10/18/89

PM/PD31:DRSP*
JStang
10/19/89

(A) PD31:DRSP
JThoma
2/8/90

OGC*
10/26/89

SPLB *P.R.*
CMcCracken
2/8/90

DFol
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Mr. B. Ralph Sylvia
Senior Vice President - Nuclear
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6400 North Dixie Highway
Newport, Michigan 48166

Dear Mr. Sylvia:

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(A)D/PD31:DRSP
JThoma
10/ /89

OGC
10/24/89

OTSB
JCalvo
10/ /89

SPLB
CMcCracken
10/ /89

*APH w/changes
w/ SER as
indicated.
APH*



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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A copy of the Safety Evaluation supporting this amendment is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "John F. Stang".

John F. Stang, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

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2. Safety Evaluation

cc w/enclosures:
See next page

Mr. B. Ralph Sylvia
Detroit Edison Company

Fermi-2 Facility

cc:

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Glen Ellyn, Illinois 60137



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DETROIT EDISON COMPANY

WOLVERINE POWER SUPPLY COOPERATIVE, INCORPORATED

DOCKET NO. 50-341

FERMI-2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 51
License No. NPF-43

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Detroit Edison Company (the licensee) dated September 30, 1988 as supplemented December 15, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-43 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 51, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. DECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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PDR ADDCK 05000341
F PDC

3. This license amendment is effective as of the date of its issuance with full implementation within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John O. Thoma, Acting Director
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 20, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 51

FACILITY OPERATING LICENSE NO. NPF-43

DOCKET NO. 50-341

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

<u>REMOVE</u>	<u>INSERT</u>
xv	xv
3/4 7-5*	3/4 7-5*
3/4 7-6	3/4 7-6
-	3/4 7-6a
3/4 7-7	3/4 7-7
3/4 7-8*	3/4 7-8*
B3/4 7-1	B3/4 7-1
-	B3/4 7-1a
B3/4 7-2*	B3/4 7-2*

*Overleaf pages provided to maintain document completeness. No changes contained on these pages.

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PLANT SYSTEMS

DIESEL GENERATOR COOLING WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.4 The diesel generator cooling water subsystem associated with each diesel generator shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE diesel generator cooling water pump, and
- b. An OPERABLE flow path capable of taking suction from the associated ultimate heat sink and transferring cooling water through the associated diesel generator heat exchanger.

APPLICABILITY: When the diesel generator is required to be OPERABLE.

ACTION:

With one or more diesel generator cooling water subsystems inoperable, declare the associated diesel generator inoperable and take the ACTION required by Specification 3.8.1.1 or 3.8.1.2, as applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.4 Each of the above required diesel generator cooling water subsystems shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b. At least once per 18 months by verifying that each pump starts automatically upon receipt of a start signal for the associated diesel generator.

PLANT SYSTEMS

ULTIMATE HEAT SINK

LIMITING CONDITION FOR OPERATION

3.7.1.5 The Ultimate Heat Sink, comprised of two one-half capacity residual heat removal (RHR) reservoirs with the capability of being cross-connected, shall be OPERABLE with:

- a. A minimum water volume of 2,990,000 gallons in each reservoir (equivalent to an indicated water level of 25 feet or 580 feet elevation).
- b. A maximum average water temperature of less than or equal to 80°F for each reservoir.
- c. At least one OPERABLE cooling tower with two cooling fans for each reservoir.
- d. A minimum combined water volume in the two reservoirs of 5,980,000 gallons.
- e. A maximum combined average water temperature for the two reservoirs of less than or equal to 80°F.
- f. A minimum average water temperature of greater than or equal to 41°F for each reservoir.
- g. Two reservoir cross-connect lines, each with two OPERABLE motor operated cross-connect valves.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, 5 and *.

ACTION:

- a. With one or more of the requirements of Specification 3.7.1.5.a, b, and c not satisfied declare the affected reservoir(s) inoperable and take the ACTION required by d. or e. below.
- b. With the combined water volume requirement of Specification 3.7.1.5.d or the combined average water temperature of Specification 3.7.1.5.e not satisfied declare both reservoirs inoperable and take the ACTION required by e. below.
- c. With one or more reservoir cross-connect valves inoperable, within 8 hours open and de-energize both valves in at least one cross-connect line and verify that these valves remain open and de-energized at least once per 7 days. The provisions of Specification 3.0.4 are not applicable. Otherwise, declare both reservoirs inoperable and take the ACTION of e. below.

*When handling irradiated fuel in the secondary containment.

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

- d. With one reservoir inoperable declare the associated RHRSW system subsystem, EESW system subsystem, and diesel generator cooling water subsystem inoperable and take the ACTION required by Specifications 3.7.1.1, 3.7.1.3 and 3.7.1.4.
- e. With both reservoirs inoperable:
 - 1. In OPERATIONAL CONDITIONS 1, 2 or 3, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
 - 2. In OPERATIONAL CONDITIONS 4 or 5, declare the RHRSW system, the EESW system and the diesel generator cooling water systems inoperable and take the ACTION required by Specifications 3.7.1.1, 3.7.1.3 and 3.7.1.4.
 - 3. In OPERATIONAL CONDITION *, declare the diesel generator cooling water systems inoperable and take the ACTION required by Specification 3.7.1.4. The provisions of Specification 3.0.3 are not applicable.
- f. With the requirements of Specification 3.7.1.5.f for one or both reservoirs not satisfied, perform a visual inspection of the reservoir(s) at least once per 12 hours to verify that no ice has formed. If ice is observed, demonstrate the OPERABILITY of each safety related pump in the reservoir(s) by running each safety related pump at least once per 8 hours. The provisions of Specification 3.0.4 are not applicable.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.7.1.5 The Ultimate Heat Sink shall be determined OPERABLE at least once per:
- a. 24 hours by verifying the individual and combined average water temperature and water volume to be within their limits.
 - b. 31 days by:
 1. Starting each cooling tower fan from the control room and operating the fan on slow speed and on fast speed,** each for at least 15 minutes.
 2. For each electrical division of cross-connect valves, verify at least one valve in the division is open.
 - c. 92 days by cycling each reservoir cross-connect valve through at least one cycle of full travel.

*When handling irradiated fuel in the secondary containment.

**Fast speed need not be tested during icing periods.

PLANT SYSTEMS

3/4.7.2 CONTROL ROOM EMERGENCY FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.2 The control room emergency filtration system shall be OPERABLE with the system composed of:

- a. The passive components of the emergency makeup air filter train.
- b. The passive components of the emergency recirculation air filter train.
- c. Two emergency makeup inlet air heaters.
- d. Two recirculation fans.
- e. Two return and supply fans.
- f. A flowpath capable of:
 1. Recirculating control room air.
 2. Supplying emergency makeup air to the control room.**

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, 5, and *

ACTION:

- a. With the control room air temperature greater than 95°F but less than 105°F, restore the control room air temperature to less than or equal to 95°F within 12 hours or go to a 4 hour operating shift. With the control room air temperature greater than or equal to 105°F, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. In OPERATIONAL CONDITION 1, 2, or 3:
 1. With one of the above required filter trains or flow paths inoperable, be in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
 2. With a recirculation, return or supply fan; emergency makeup inlet air heater; damper; or other required redundant component inoperable, restore the inoperable component to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. In OPERATIONAL CONDITION 4, 5 or *:
 1. With a recirculation, return or supply fan; emergency makeup inlet air heater; damper; or other required redundant component inoperable, restore the inoperable component to OPERABLE status within 7 days or initiate and maintain operation of the system in the recirculation mode of operation.
 2. With the control room emergency filtration system inoperable, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.
- d. The provisions of Specification 3.0.3 are not applicable in Operational Condition *.

*When irradiated fuel is being handled in the secondary containment.

**Not applicable in the chlorine mode of operation.

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 SERVICE WATER SYSTEMS

The OPERABILITY of the service water systems ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of these systems, assuming a single failure, is consistent with the assumptions used in the accident conditions within acceptable limits.

The Ultimate Heat Sink consist of two 50% capacity Residual Heat Removal (RHR) reservoirs which must be capable of being cross-connected. Surveillance Requirement 4.7.1.5.b.2 assures that the ability to cross-connect the two reservoirs is not compromised in the event of a failure of a single electrical power source.

3/4.7.2 CONTROL ROOM EMERGENCY FILTRATION SYSTEM

The OPERABILITY of the control room emergency filtration system ensures that (1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and (2) the control room will remain habitable for operations personnel during and following all design basis accident conditions. Continuous operation of the system with heaters OPERABLE for 10 hours during each 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50.

3/4.7.3 SHORE BARRIER PROTECTION

The purpose of the shore barrier is to protect the site backfill from wave erosion.

Category 1 structures are designed to withstand the impact of waves up to 5.4 feet. So long as the backfill is in place, waves greater than 5.4 feet cannot impact Category 1 structures because of the lack of sufficient depth of water to sustain such waves.

The shore barrier can sustain a high degree of damage and still perform its function, protecting the site backfill from erosion. Thus the operability condition for operation of the shore barrier has been written to ensure that severe damage to the structure will not go undetected for a substantial period of time and provide for prompt NRC notification and corrective action.

PLANT SYSTEMS

BASES

3/4.7.4 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor pressure exceeds 150 psig. This pressure is substantially below that for which the low pressure core cooling systems can provide adequate core cooling for events requiring the RCIC system.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2, and 3 when reactor vessel pressure exceeds 150 psig because RCIC is the primary non-ECCS source of emergency core cooling when the reactor is pressurized.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

WOLVERINE POWER SUPPLY COOPERATIVE, INCORPORATED

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated September 30, 1988, the Detroit Edison Company (DECo or the licensee) requested amendment to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-43 for Fermi-2. The proposed amendment would revise the LCO, ACTION requirements and surveillance requirements for the Ultimate Heat Sink (UHS) to better reflect the UHS design basis as a single water source of two one-half capacity Residual Heat Removal (RHR) reservoirs capable of being cross-connected to supply full cooling capacity to either division's RHR Heat Exchanger and other safety-related equipment. By letter dated December 15, 1989 the licensee proposed to change Section 3/4.7.1 of the bases to better reflect Surveillance Requirement 4.7.1.5.b.2.

2.0 EVALUATION

The Fermi-2 Ultimate Heat Sink (UHS) consists of two one-half capacity reinforced-concrete RHR reservoirs of Category I construction, each with a capacity of 3,450,000 gallons of water. The reservoirs are connected by redundant valved lines to permit access to the combined inventory of the two reservoirs to either RHR division in the event of a mechanical failure in one of the RHR divisions. Each line contains two isolation valves of Category I construction that are remotely operable from the main control room.

Specification 3.7.1.5 of the Fermi-2 Technical Specifications does not adequately address the Ultimate Heat Sink as a single source of water to both RHR divisions. Instead, the Limiting Condition for Operation (LCO) and ACTION Requirements are written to imply that each reservoir can independently provide the required heat removal capability for either RHR division. However, with one RHR reservoir inoperable, the potential exists that the two RHR reservoirs as a whole do not meet the design requirements for the UHS. The proper ACTION when the UHS design basis is not met is to require a prompt plant shutdown. This ACTION is currently specified only when both RHR reservoirs are inoperable.

To correct this situation, DECo has proposed modification to the TS concerning the UHS LCO. In addition to the current requirements for each reservoir individually (which are retained as 3.7.1.5.a,b,c and f), new combined water volume and maximum temperature requirements are included as 3.7.1.5.d and e.

PLANT SYSTEMS

BASES

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCI system and justifies the specified 14-day out of service period.

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

3/4.7.5 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Onsite Review Organization. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval varies inversely with the observed snubber failures on a given system and is determined by the number of inoperable snubbers found during an inspection of each system. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system

The combined requirements correspond to the current worst-case allowed heat capacity of the two individual reservoirs, i.e., both reservoirs at the allowed minimum water level and maximum water temperature.

The status of the two RHR reservoirs as composing one-half of the capacity of the UHS and need to have the capability to cross-connect to the reservoirs is proposed to be included in the LCO. In addition DECo proposed to require the OPERABILITY of the cross-connect lines and the associated motor-operated valves in new LCO 3.7.1.5.g.

The staff has reviewed the proposed LCO and finds it acceptable on the basis that it retains all current individual reservoirs requirements while adding conservative new requirements consistent with the UHS design (which was reviewed and accepted by the staff in Section 9.2.2 of the Fermi-2 Safety Evaluation Report, NUREG-0798, Supplement 6 dated July 1985).

DECo has proposed new ACTION requirements to reflect the revised LCO. ACTIONS a, d, c and f in conjunction provide the current ACTION requirements for individual reservoirs inoperability. Proposed ACTION b in conjunction with ACTION e assures that a prompt plant shutdown occurs if the combined water volume and temperature requirements are not met and thus the UHS as a whole does not meet its design requirements. A provision to except proposed ACTION f (current ACTION d) from the provisions of Specification 3.0.4 is also proposed; evaluation of this aspect is provided separately below.

DECo has proposed in ACTION c. compensatory measure to be taken in the event of one or more inoperable cross-connect valves. The measures provide positive assurance, with periodic verification, that the reservoirs are cross-connected and thus the UHS is capable of performing its designed function as a single water source. If the design function of the UHS cannot be assured, the ACTION requires a prompt plant shutdown. DECo also proposes that this ACTION be exempt from Specification 3.0.4; this aspect is evaluated separately below.

The staff has reviewed the proposed ACTION requirements described above and finds them acceptable on the basis that all current ACTION requirements are retained and appropriate ACTION or compensatory measures are specified for new LCO provisions which ensure that either the ability of the UHS to meet its design basis is maintained or a prompt plant shutdown is required. Since proposed ACTIONS c. and f. allow plant operation for an unlimited period of time, provisions are proposed to exclude these ACTIONS from the provisions of Specification 3.0.4., which would prevent changing OPERATIONAL CONDITION while operating under the provisions of these ACTIONS. This is consistent with guidance of Generic Letter 87-09.

When one or more of the cross-tie valves are inoperable the Ultimate Heat Sink remains OPERABLE as long as the two reservoirs are cross-connected as required by ACTION c. Further, the cross-connect valves are located near the bottom of the RHR reservoir and potentially present an unusual difficulty for repair.

In view of these circumstances, DECo believes that a change in OPERATIONAL CONDITION should be allowed when operating under the provisions of ACTION c.

When a reservoir temperature is less than 41°F, proposed ACTION f. allows continued operation provided that compensatory ACTION is taken to assure that the Ultimate Heat Sink OPERABILITY is not degraded due to potential ice formation. DECo believes that restricting changes in OPERATIONAL CONDITION when operating under the provisions of ACTION f. is not warranted since acceptable means of assuring that the Ultimate Heat Sink remains OPERABLE exist in the Technical Specifications. In light of these compensatory ACTIONS taken to ensure OPERABILITY and the guidance of Generic Letter 87-09, DECo is proposing that Specification 3.0.4 not apply to proposed ACTION f.

The staff has reviewed these proposed exceptions to Specification 3.0.4 and finds them acceptable, since they meet the general requirements of Generic Letter 87-09 and, in these cases when the plant is operating under the provisions of the subject ACTION statements, the UHS OPERABILITY is adequately assured to be fully maintained. Further, the circumstances which required operations under these ACTIONS may not be easily reviewed during the short duration outages which may occur. Thus, in view of the compensatory measures to assure UHS OPERABILITY, the staff has determined the application of Specification 3.0.4 to these ACTIONS to be unnecessary.

DECo has modified the daily surveillance requirement to include verification of the combined reservoir water temperature and volume. This is consistent with current requirements and therefore acceptable.

DECo has also proposed modification of Surveillance Requirement (SR) 4.7.1.5.b.2, the monthly cross-connect valve surveillance. The current SR is interpreted by DECo to assure that the two reservoirs remain not cross-connected while ensuring that the reservoirs can be remotely cross-connected from the Control Room even under the loss of either division of AC power. DECo has proposed to modify the surveillance requirement to solely assure that if not cross-connected the reservoirs can be remotely cross-connected in the event of the loss of either division of AC power. (Since the two valves in each cross-connect line are powered from different divisions, ensuring that one valve in each electrical division is open ensures that the reservoirs are cross-connected or that a second valve can be opened in at least one line.) By letter dated December 15, 1989 the licensee proposed changes to Bases Section 3/4.7.1 to clarify and indicate the purpose of surveillance requirement 4.7.1.5.b.2 to ensure that TS users fully understand the purpose of the requirement.

The staff has reviewed the bases changes and finds them acceptable.

The two RHR reservoirs are designed to be capable of being separated in order to mitigate the consequences of a below-grade breach of the Category I RHR complex structure below the grade level. DECo asserts that this event is highly unlikely and would be easily detected and mitigated since the water inventory loss would be limited to approximately 10 percent of the UHS capacity by the site ground water level.

The staff review has determined that:

- ° The below-grade breach of the Category I RHR complex structures is extremely unlikely particularly in conjunction with an event which would require the full capacity of the UHS;

- ° The additional water loss from the postulated breach when the reservoirs are cross-connected is approximately 5% of the UHS capacity;
- ° The postulated breach can be easily detected by the daily surveillance requirements and the UHS heat capacity can be easily supplemented by pumping water from Lake Erie or other close-by water sources;
- ° DECo has committed to maintain a normal system line-up of the two reservoirs not cross-connected;
- ° The addition of further requirements to assure the reservoirs are not normally cross-connected adds undue complexity to an already complex TS; and
- ° Since the proposed surveillance assures that the two reservoirs can be remotely cross-connected in the event of the failure of either AC power division, the proposed surveillance requirements are acceptable.

Based on the above evaluation the staff finds the proposed changes to TS acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. We have determined that this amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents which may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: February 20, 1990