

January 24, 1989

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Docket No. 50-341

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

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Dear Mr. Sylvia:

SUBJECT: AMENDMENT NO. 30 TO FACILITY OPERATING LICENSE NO. NPF-43: REMOVAL
OF ORGANIZATIONAL CHARTS FROM THE TECHNICAL SPECIFICATIONS
(TAC NO. 68495)

The Commission has issued the enclosed Amendment No. 30 to Facility Operating License No. NPF-43 for the Fermi-2 facility. This amendment consists of changes to the Plant Technical Specifications in response to your letter dated June 24, 1988 (NRC-88-0110).

The amendment revises the Fermi-2 Technical Specifications to remove the organization charts from the Technical Specifications following the guidance provided in NRC Generic Letter 88-06.

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

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

Enclosures:

- 1. Amendment No. 30 to NPF-43
- 2. Safety Evaluation

cc w/enclosures:
See next page

LA/PD31:DRSP
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 24, 1989

Docket No. 50-341

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

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Sincerely,

A handwritten signature in dark ink, appearing to read "John F. Stang".

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

Enclosures:

1. Amendment No. 30 to NPF-43
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. B. Ralph Sylvia
Detroit Edison Company

Fermi-2 Facility

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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. 30
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 June 24, 1988 (NRC-88-0110), 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. 30, 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 ADOCK 05000341
FDC

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Theodore R. Quay

Theodore R. Quay, Acting Director
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 24, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 30

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>
xxi	xxi
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6-2	6-2
-	6-2a
6-3	6-3
6-4	6-4
6-6	6-6
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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit safe operation and shall delegate in writing the succession to this responsibility during his absence. The Plant Manager shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

6.1.2 The Nuclear Shift Supervisor or, during his absence from the control room, a designated individual shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President-Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATION

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated Final Safety Analysis Report.
- b. The Senior Vice President shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support of the plant to ensure nuclear safety.
- c. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Operator shall be in the control room;

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site fire brigade of at least five members shall be maintained on site at all times*. The fire brigade shall not include the Nuclear Shift Supervisor, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physics personnel, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or a Section Superintendent or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or a Section Superintendent to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- g. The Operations Engineer, Nuclear Shift Supervisor, and Nuclear Assistant Shift Supervisor shall hold a Senior Reactor Operator license. The Nuclear Supervising Operator shall hold a Reactor Operator or Senior Reactor Operator license.

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FIGURE PAGE DELETED

TABLE 6.2.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
NSS	1	1
NASS	1	None
NSO	2	1
NPPO/NAPPO	2	1
STA	1	None

TABLE NOTATION

- NSS - Nuclear Shift Supervisor with a Senior Operator license
- NASS - Nuclear Assistant Shift Supervisor with a Senior Operator license
- NSO - Nuclear Supervising Operator with an Operator license
- NPPO/NAPPO - Nuclear Power Plant Operator or Nuclear Assistant Power Plant Operator
- STA - Shift Technical Advisor

Except for the Nuclear Shift Supervisor, the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Nuclear Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 1, 2 or 3, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Nuclear Shift Supervisor from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving unit safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five dedicated, full-time engineers located onsite, each with a bachelor's degree in engineering or related science and at least two years professional level experience in his field, at least one year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Chairman, Nuclear Safety Review Group.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Superintendent - Radiation Protection or his designee who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Director(s), Nuclear Training, shall meet or exceed the requirements and recommendations of Section 5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 29, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 ONSITE REVIEW ORGANIZATION (OSRO)

FUNCTION

6.5.1.1 The OSRO shall function to advise the Plant Manager on all matters related to nuclear safety as described in Specification 6.5.1.6

COMPOSITION

6.5.1.2 The OSRO shall be composed of the:

Chairman	Plant Manager
Vice-Chairman/Member*	Director, Plant Safety
Vice-Chairman/Member*	Superintendent-Operations
Member	Operations Engineer
Member	Superintendent-Technical
Member	Superintendent-Radiation Protection
Member	Superintendent-Maintenance and Modifications
Member	Reactor Engineer

*May not act as Chairman and member at the same time.

ADMINISTRATIVE CONTROLS

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the OSRO Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in OSRO activities at any one time.

MEETING FREQUENCY

6.5.1.4 The OSRO shall meet at least once per calendar month and as convened by the OSRO Chairman or a Vice Chairman.

QUORUM

6.5.1.5 The quorum of the OSRO necessary for the performance of the OSRO responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or a Vice Chairman and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The OSRO shall be responsible for:

- a. Review of all Plant Administrative Procedures and changes thereto;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. Review of the safety evaluations for plant procedures and changes thereto completed under the provisions of 10 CFR 50.59;
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President-Nuclear Operations and to the Nuclear Safety Review Group;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Group;
- j. Review of the Security Plan;
- k. Review of the Emergency Plan;

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President-Nuclear Operations and to the Nuclear Safety Review Group; and
- m. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and major modifications to the Radwaste Treatment Systems.

6.5.1.7 The OSRO shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing to the Nuclear Safety Review Group with regard to whether or not each item considered under Specification 6.5.1.6a. through f. constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President-Nuclear Operations and the Nuclear Safety Review Group of disagreement between the OSRO and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The OSRO shall maintain written minutes of each OSRO meeting that, at a minimum, document the results of all OSRO activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President-Nuclear Operations and the Nuclear Safety Review Group.

6.5.2 NUCLEAR SAFETY REVIEW GROUP (NSRG)

FUNCTION

6.5.2.1 The NSRG shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological controls,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NSRG shall report to and advise the Senior Vice President on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The Senior Vice President shall appoint at least nine members to the NSRG and shall designate from this membership a Chairman and at least one Vice Chairman. The membership shall collectively possess experience and competence to provide independent review and audit in the areas listed in Section 6.5.2.1. The Chairman and Vice Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the NSRG review of complex problems. All members shall have at least a bachelor's degree in engineering or related sciences. The Chairman shall have at least 10 years of professional level management experience in the power field and each of the other members shall have at least 5 years of cumulative professional level experience in one or more of the fields listed in Section 6.5.2.1.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the NSRG Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRG activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRG Chairman to provide expert advice to the NSRG.

MEETING FREQUENCY

6.5.2.5 The NSRG shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NSRG necessary for the performance of the NSRG review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least one half of the remaining NSRG members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRG shall be responsible for the review of 6.5.2.7.a and shall review 6.5.2.7.b through i:

- a. The safety evaluations for (1) changes to procedures, equipment, facilities or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;

ADMINISTRATIVE CONTROLS

REVIEW (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRG. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;

ADMINISTRATIVE CONTROLS

AUDITS (Continued)

- g. Any other area of unit operation considered appropriate by the NSRG or the Senior Vice President;
- h. The radiological environmental monitoring program and the results thereof at least once per 12 months;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

RECORDS

6.5.2.9 Records of NSRG activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRG meeting shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Senior Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/organization.

ADMINISTRATIVE CONTROLS

REVIEW

6.5.3.2 Each procedure or procedure change prepared in accordance with 6.5.3.1 above and not reviewed in accordance with Section 6.5.1.6 shall be reviewed for technical adequacy by a qualified individual other than the individual that prepared the procedure or change thereto. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review(s) shall be performed by personnel of the appropriate discipline.

6.5.3.3 Each procedure required by Specification 6.8.1.h through j, or changes thereto, shall be reviewed by the Superintendent-Radiation Protection or his designee. The Environmental Program Coordinator will review any changes pertaining to 6.8.1.j. These reviews may be performed in lieu of, or in addition to, those required by item 6.5.3.2 above.

SAFETY EVALUATIONS

6.5.3.4 When required by 10 CFR 50.59, a safety evaluation to determine whether or not an unreviewed safety question is involved shall be included in the review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or procedure change.

QUALIFICATIONS

6.5.3.5 Individuals performing the reviews and evaluations in accordance with 6.5.3.2 through 6.5.3.4 above shall meet or exceed the qualifications stated in Sections 4.2 or 4.4 of ANSI N18.1-1971 for the appropriate discipline, and shall be members of the plant staff previously designated in writing by the Plant Manager.

RECORDS

6.5.3.6 Written records of reviews and evaluations performed in accordance with items 6.5.3.2 through 6.5.3.4 above, including recommendations for approval or disapproval, shall be prepared and maintained.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSRO, and the results of this review shall be submitted to the NSRG and the Vice President-Nuclear Operations.

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President-Nuclear Operations and the NSRG shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the OSRO. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRG, and the Vice President-Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the Fermi 2 commitments made in response to the requirements of NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6.8.2 Each plant administrative procedure, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6, and approved by the Plant Manager prior to implementation, and shall be reviewed periodically thereafter as set forth in administrative procedures.

6.8.3 Each plant procedure required by Specification 6.8.1, other than administrative procedures, and changes thereto, shall be reviewed in accordance with 6.5.3, and approved by the Plant Manager prior to implementation and shall be reviewed periodically thereafter as set forth in administrative procedures. The Plant Manager may delegate approval authority in writing for specific types of procedures to a Section Superintendent.

6.8.4 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on Fermi 2; and
- c. The change is documented, and reviewed and approved in accordance with either 6.8.2 or 6.8.3 above, as appropriate, within 14 days of implementation.

6.8.5 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, reactor water sampling, containment sampling, reactor water cleanup, combustible gas control, control rod drive discharge headers, and standby gas treatment systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions.

The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

d. High Density Spent Fuel Racks

A program which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to

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



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO.30 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

INTRODUCTION

By letter dated June 24, 1988 (NRC-88-0110), the Detroit Edison Company (DECo or the licensee) proposed changes to Technical Specifications (TSs) 6.2.1, "Offsite Organization", and 6.2.2, "Unit Staff". The proposed changes would remove Figure 6.2.1-1, "Offsite Organization", and Figure 6.2.2-1, "Unit Organization", and replace them with a narrative description of the offsite and onsite organization functional requirements in TS 6.2.1 and unit staff qualifications in 6.2.2. Guidance for these proposed changes to the TSs was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988. In addition, the following changes to TS Section 6.0 were proposed in this amendment:

1. Change of the titles "Group Vice President" to "Senior Vice President" and "Technical Engineer" to "Superintendent-Technical". No changes in duties and responsibilities would be involved.
2. Change of the titles "Radiation Protection-Chemical Engineer" and "Radiation Protection Engineer" to "Superintendent-Radiation Protection". This change would reflect the reassignment of the responsibility for chemistry matters to the Superintendent-Operations and subsequent title changes.
3. Change in reporting responsibilities for the Independent Safety Engineering Group (ISEG), which would report to the Chairman, Nuclear Safety Review Group (NSRG) rather than the Group (being changed to Senior) Vice President. The Chairman, NSRG, reports to the Senior Vice President. Specification 6.2.3.4 would be modified to reflect this change.
4. Elimination of the title "General Supervisor-Health Physics". The title, which is used in TSs 6.3.1 and 6.5.3.3, would be replaced with the wording "Superintendent-Radiation Protection or his designee".
5. Deletion of a footnote in TS 6.8.5 delaying the requirements for post-accident sampling since it is no longer necessary. The footnote applied only to operation prior to the plant first achieving 5% of RATED THERMAL POWER.
6. Elimination of the title "Assistant Director, Plant Safety". The title,

which appears in TS 6.5.1.2 as a replacement Onsite Review Organization (OSRO) Vice-Chairman, would be replaced with "Superintendent-Operations" for OSRO purposes.

7. Also, in TS 6.5.1.2, the position designated as OSRO Vice-Chairman would be designated as an OSRO member as well as Vice-Chairman. This is to clarify the intent of the specification, as a Vice-Chairman cannot act as a Chairman and as a member at the same time.
8. The term "Section Superintendent" would replace a longer phrase in TS 6.8.3 to indicate which supervisors may be delegated procedure approval authority. The new terminology, currently used in TS 6.2.2 in regard to overtime controls, would retain the concept of delegation to the appropriate experienced supervisor directly reporting to the Plant Manager while allowing some flexibility in establishing titles and positions.

BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by the applicant and included in the TSs issued with the operating license. Subsequent restructuring of either the offsite or unit organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TSs. The Shearon Harris licensee proposed changes to remove organization charts from its TSs under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the NRC staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably, Appendix B to 10 CFR 50. However, there are aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and would be retained with the removal of the organization charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2. to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the NRC staff issued Amendment No. 3 to Facility Operating License NPF-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TSs. Subsequently, the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from TSs. Generic Letter 88-06 provided this guidance to

all power reactors.

EVALUATION

The licensee's proposed changes to remove the organization charts from its TSs are in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

1. Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2.1-1 and 6.2.2-1 that were removed from the TSs.
2. Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the Updated Final Safety Analysis Report.
3. The senior reactor operator and reactor operator license qualified positions of the unit staff were added to Specification 6.2.2. Therefore, this requirement that was identified on the organization chart for the unit staff will be retained.
4. Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the Updated Final Safety Analysis Report.
5. The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from the TSs for its plant. Hence, this is not an applicable consideration with regard to the need to redefine referenced requirements as a result of the removal of these figures.

On the basis of our review of the above items, we conclude that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TSs. Furthermore, we find that these changes are consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06. Accordingly, we find the proposed changes to be acceptable.

The additional changes to TS Section 6.0 are evaluated as follows:

1. The title changes of "Group Vice President" to "Senior Vice President" and "Technical Engineer" to "Superintendent-Technical" are considered to be merely title changes that have no impact on the duties and responsibilities of the position. We therefore find these changes acceptable.
2. The reorganization changes involving the change of titles "Radiation Protection-Chemical Engineer" and "Radiation Protection Engineer" to "Superintendent-Radiation Protection" and the reassignment of the

responsibility for chemistry matters are considered administrative changes that do not impact on the Code of Federal Regulations or NRC policies regarding title changes of positions. Therefore, we find the requested changes acceptable.

3. The change in reporting responsibilities for the ISEG is considered an administrative change that will not impact the safety level of the ISEG. We find it acceptable.
4. The elimination of the title "General Supervisor-Health Physics", and replacement with the wording "Superintendent-Radiation Protection or his designee" in TSs 6.3.1 and 6.5.3.3 is considered an administrative change that has no impact on the plant margin of safety. We find this change acceptable.
5. The deletion of the footnote for delaying the requirements for post-accident sampling is considered an administrative change that has no impact on the plant margin of safety. This footnote applied only to operation prior to the plant first achieving 5% of RATED THERMAL POWER and is no longer necessary for plant safety. We therefore find it acceptable.
6. The changes requested concerning the OSRO, replacement of the title "Assistant Director, Plant Safety", with "Superintendent-Operations", and designating OSRO Vice-Chairman positions as members as well as Vice-Chairman, are considered to be administrative changes that will not impact the safety level of the OSRO. We find these changes acceptable.
7. The replacement of the phrase to indicate which supervisors may be delegated procedure approval authority by the term "Section Superintendent", on TS 6.8.3., is considered a change which will have no impact on the plant margin of safety. We find that this change would adequately retain the concept of delegation to the appropriate experienced supervisor, as currently used in TS 6.2.2. This change does not eliminate or alter the organizational functions previously reviewed and is, therefore, acceptable.

ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

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, (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: January 24, 1989