

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

October 19, 1999

SUBJECT: FERMI 2 - ISSUANCE OF AMENDMENT RE: ONE-TIME CHANGE TO THE REQUIREMENTS FOR PENETRATION X-26 IN THE DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM SPECIFICATION (TAC NO. MA6752)

Dear Mr. Gipson:

The Commission has issued the enclosed Amendment No. 135 to Facility Operating License No. NPF-43 for the Fermi 2 facility. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated September 24, 1999 (NRC-99-0082). A Notice of Enforcement Discretion (NOED) related to the subject TS was issued verbally on September 23, 1999. The NOED was documented in a letter to you dated September 27, 1999. This amendment supersedes the NOED.

The amendment revises current TS 3.6.1.8 by adding footnote "***" to Action b. The footnote allows continued operation of Fermi 2 with the leakage of penetration X-26 exceeding the limit in TS 4.6.1.8.2, provided certain compensatory measures are taken. Operation would be allowed to continue until the next plant shutdown.

Because the NRC staff issued the Fermi 2 improved standard TSs (ITS) on September 30, 1999, with implementation within 90 days, the licensee has also provided a version of the TS amendment that would be compatible with the ITS. This version adds a new special operations TS, ITS 3.10.8, to address the compensatory actions and other requirements associated with penetration X-26. This amendment provides TS pages in both the current TS and ITS formats.

A copy of our Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Original signed by:
Andrew J. Kugler, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Docket No. 50-341

Enclosures: 1. Amendment No. 135 to NPF-43
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 19, 1999

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

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(TAC NO. MA6752)

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Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Kugler".

Andrew J. Kugler, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures: 1. Amendment No. 135 to NPF-43
2. Safety Evaluation

cc w/encls: See next page

Mr. Douglas R. Gipson
Detroit Edison Company

Fermi 2

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DETROIT EDISON COMPANY

DOCKET NO. 50-341

FERMI 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 135
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 24, 1999, 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.

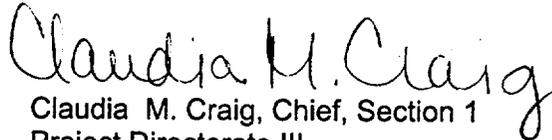
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-43 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 135 , 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.

3. This license amendment is effective as of its date of issuance and shall be implemented within 5 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: October 19, 1999

ATTACHMENT TO LICENSE AMENDMENT NO.135

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 vertical lines indicating the area of change.

For the current Technical Specifications (i.e., prior to implementing Amendment No. 134)

REMOVE

3/4 6-14

INSERT

3/4 6-14

For the improved Technical Specifications (i.e., after implementing Amendment No. 134)

REMOVE

N/A

N/A

N/A

INSERT

3.10-22

3.10-23

B 3.10.8-1

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system (6-inch, 10-inch, 20-inch, and 24-inch valves) may be in operation with the supply and exhaust isolation valves in one supply line and one exhaust line open for inerting, deinerting or pressure control. Nitrogen VENTING/makeup and pressure control is also allowed through the 1-inch valves. Purge/vent operations through the SGTS shall be limited to 90 hours each 365 days.*

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With a drywell and suppression chamber purge system supply and/or exhaust isolation valve open, except as permitted above, close the valve(s) or otherwise isolate the penetration(s) within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With a drywell and suppression chamber purge system supply and/or exhaust isolation valve(s) with resilient material seals having a measured leakage rate exceeding the limit of Specification 4.6.1.8.2, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.**

SURVEILLANCE REQUIREMENTS

4.6.1.8.1 Before being opened for purge/vent operation through SGTS, the drywell and suppression chamber purge supply and exhaust butterfly isolation valves shall be verified not to have been open for purge/vent operation through SGTS for more than 90 hours in the previous 365 days.*

4.6.1.8.2 At least once per 92 days each penetration for each 6-inch, each 10-inch, each 20-inch, and each 24-inch drywell and suppression chamber purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE by verifying that the measured leakage rate is less than or equal to $0.05 L_a$ when pressurized to P_a .

* Primary containment nitrogen VENTING and pressure control is permitted through the 1-inch valves and is not subject to the 90 hours per 365 day limit.

**For Penetration X 26 inoperability due to leakage exceeding the limit of 4.6.1.8.2, operation may continue until the next plant shutdown provided that the penetration is isolated via deactivated and closed valves T4800F407, with flanged cover, and T4800F408 and that these valves are verified deactivated and closed every 31 days. For the purpose of this exception, Surveillance testing on T4800F407 and T4800F408 shall be deferred until the next shutdown. At least every 45 days, leak testing will be performed to verify that the limit of $0.6 L_a$ is not exceeded due to additional penetration leakage. This testing will also qualitatively continue to verify the integrity of outboard valves T4800F407 and T4800F408. These requirements remain in effect until the isolation valve leakage is restored to within applicable limits. This leakage shall be restored to within applicable limits prior to startup from the next plant shutdown.

3.10 SPECIAL OPERATIONS

3.10.8 T4803F601, Nitrogen Inerting Drywell Air Purge Inlet Supply Valve

LCO 3.10.8 LCO 3.6.1.3, "PCIVs," may be changed to exclude penetration X26 flow paths for purge valve leakage rate not within limit provided:

- a. Penetration X26 outboard isolation valves T4800F407 and T4800F408 are closed and deactivated;
- b. Penetration X26 piping outboard of T4800F407 is closed by a blind flange;
- c. This Special Operation allowance is withdrawn on the first entry into MODE 2 or MODE 3.

.....NOTE.....
 Upon exiting this Special Operation LCO the 24 hour Completion Time of LCO 3.6.1.3 Required Action D.1 is considered expired for purge valve leakage not within limit.

APPLICABILITY: MODE 1 with SR 3.6.1.3.6 not met.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more requirements of the LCO not met.	A.1 Enter the applicable Condition of LCO 3.6.1.3, "PCIVs."	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.10.8.1 Verify penetration X26 outboard isolation valves T4800F407 and T4800F408 are closed and deactivated.</p>	<p>-----NOTE----- SR 3.0.2 is not applicable. ----- 31 days</p>
<p>SR 3.10.8.2 -----NOTE----- Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1.1. ----- Perform leakage rate testing for primary containment purge valves with resilient seals on penetration X26.</p>	<p>-----NOTE----- SR 3.0.2 is not applicable. ----- 45 days</p>

B 3.10 SPECIAL OPERATIONS

B 3.10.8 T4803F601, Nitrogen Inerting Drywell Air Purge Inlet Supply Valve

BASES

The Background, Applicable Safety Analysis, and other related Bases are presented in References 1 and 2.

REFERENCES

1. "Request For Enforcement Discretion," letter from D.R. Gipson (DECo) to NRC, NRC-99-0092, dated September 24, 1999.
2. "Proposed Exigent Technical Specification Change (License Amendment To Technical Specification "TS 3/4.6.1.8, Drywell and Suppression Chamber Purge System," letter from D.R. Gipson (DECo) to NRC, NRC-99-0082, dated September 24, 1999.
2. NRC Safety Evaluation for Fermi-2 Amendment No. 135.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 135 FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated September 24, 1999, the Detroit Edison Company (DECo or the licensee) requested an amendment to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-43 for Fermi 2. The proposed amendment would revise current TS 3.6.1.8 by adding footnote "***" to Action b. The footnote would allow continued operation of Fermi 2 with the leakage of penetration X-26 exceeding the limit in TS 4.6.1.8.2, provided certain compensatory measures are taken. Operation would be allowed to continue until the next plant shutdown.

Because the NRC staff issued the Fermi 2 improved standard TSs (ITS) on September 30, 1999 (Amendment No. 134), with implementation within 90 days, the licensee also provided a version of the TS amendment that would be compatible with the ITS. This version would add a new special operations TS, ITS 3.10.8, to address the compensatory actions and other requirements associated with penetration X-26.

2.0 BACKGROUND

Current TS 3.6.1.8, "Drywell and Suppression Chamber Purge System," addresses the requirements associated with the purge system containment penetrations. TS 4.6.1.8.2 requires the licensee to verify that the leakage rate of each of the associated isolation valves is less than or equal to $0.05 L_a$ when pressurized to design-basis loss-of-coolant-accident maximum peak containment pressure (P_a , or 56.5 psig). L_a is defined as the maximum allowable leakage rate for the primary containment. If the leakage rate limit in TS 4.6.1.8.2 is exceeded by any valve, that valve would be declared inoperable and the licensee would enter TS 3.6.1.8, Action b. Action b requires the licensee to restore any inoperable valve(s) to operable status within 24 hours or be in hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

Penetration X-26 has three primary containment isolation valves (PCIVs) that are tested concurrently (i.e., the test does not provide the leakage rates for individual valves; rather, it provides the combined leakage rate for all three valves.) The single inboard isolation valve is a 24-inch butterfly valve (T4803F601) and the two outboard isolation valves (in parallel) are a 24-inch butterfly valve (T4800F407) and a 10-inch butterfly valve (T4800F408). The piping configuration is such that T4800F407 is open directly to secondary containment on one side.

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This configuration lends itself to a direct visual inspection of the valve seat. Valve T4800F408 connects to the nitrogen supply system. During leak testing, boundary valves are used to isolate T4800F408 from the nitrogen system. A vent valve between T4800F408 and the test boundary valves is used to depressurize and vent the piping outboard from T4800F408.

On September 22, 1999, the licensee performed a local leak rate test (LLRT) for penetration X-26, as required by TS 4.6.1.8.2. This test was performed by pressurizing between the inboard and outboard isolation valves and measuring the total leakage of the isolation valves. The penetration exceeded its TS limit of less than $0.05 L_a$ (equivalent to 14.87 standard cubic feet per hour (SCFH)). The measured penetration leakage rate was 26.7 SCFH. Based on direct observation of T4800F407 and observation of an open $\frac{3}{4}$ -inch vent connection outboard of T4800F408, licensee test personnel concluded that the penetration failed its LLRT due to seat leakage through T4803F601. Subsequently, the licensee stroked T4803F601 under light pressure in an attempt to clear the sealing surfaces of any debris. The licensee performed the LLRT again, and the leakage from penetration X-26 increased to 82.85 SCFH. Since the only evolution performed between the two LLRTs was the stroking of T4803F601, the licensee concluded that this subsequent LLRT result substantiated that the leakage was attributable to T4803F601. A licensee level II VT inspector performed visual and audio inspection (utilizing Snoop, a soap bubble-type test, to aid in leak detection) for leakage at the exposed side of T4800F407 and at the vent connection outboard of T4800F408 during both tests on September 22, 1999. The licensee indicated that the inspector observed insignificant leakage relative to the measured leakage rates. A licensee level III VT inspector also observed the leakage testing and concluded that T4800F407 and T4800F408 were insignificant contributors to the leakage during the second test. Snoop was utilized to aid in leak detection during both tests. Snoop was applied to the seal of T4800F407 and minor bubbling was observed. It was also used at the vent connection outboard of T4800F408 and no leakage was detected through this valve.

The licensee reviewed the LLRT and maintenance records and did not find any indication of an adverse trend for this penetration. Results of previous LLRTs for the penetration ranged between approximately 0.6 SCFH and 1.75 SCFH since October 1998 (four tests). Failure of T4803F601 was not anticipated and, based on the magnitude of the leak and the change in leakage following valve stroke, the licensee concluded that the likely cause of the leakage was failure of the seal. The seal was replaced during the Sixth Refueling Outage (autumn of 1998). Based on the previous test results, the licensee concluded that it is unlikely that the cause of this test failure is attributable to any valve other than T4803F601.

Consistent with 10 CFR 50, Appendix J, for total Type B and Type C testing, the overall primary containment leakage allowed by TS 3/4.6.1.1 is $0.6 L_a$. This equates to 178 SCFH. The sum of the known leakage from all containment penetrations prior to the September 22, 1999, test was 67.28 SCFH, leaving a margin of 110.72 SCFH. The leakage from penetration X-26 was 82.85 SCFH, leaving a margin of 27.87 SCFH, when considering T4803F601 as a single boundary valve (i.e., not crediting the outboard valves to limit leakage). The outboard valves, when closed, would be expected to significantly increase this margin, even though the leakage through the outboard valves could not be quantified. In addition, with the penetration X-26 outboard valves closed, the licensee concluded that the leakage for this penetration remains well within the $0.05 L_a$ limit associated with TS 3.6.1.8.

On September 23, 1999, the licensee requested that the NRC exercise discretion not to enforce compliance with the actions required in TS 3/4.6.1.8. The licensee's safety basis for this request is summarized as follows:

The licensee will isolate the affected penetration using outboard isolation valves T4800F407 and T4800F408. While leak rate testing for this penetration can not quantify the leakage of the outboard valves individually, the licensee believes the leakage rate through these isolation devices is well below the acceptance criteria, as discussed above. In addition, the licensee will periodically verify that the penetration is isolated. The licensee stated that the reliability of the resilient seals in these valves and the other similar penetrations at Fermi 2 has been high, providing confidence that unexpected degradation is not occurring in these valves.

The licensee stated that T4803F601 is not a risk-significant component in the Level 1 Fermi 2 Probabilistic Safety Analysis¹ (PSA). The licensee concluded that T4803F601 is not an initiator of an event that leads to core damage and does not mitigate a core damage event and the failure of T4803F601 has no effect on core damage and is not modeled in the Level 1 Fermi 2 PSA.

The licensee stated that T4803F601 is a credited component of the Level 2 Fermi 2 PSA. To isolate penetration X-26, T4803F601 or the outboard isolation valves must close. The success criterion is that either inboard or outboard isolation valves in a line must close and remain closed for 24 hours. With the penetration isolated by the outboard isolation valves, the licensee concluded that the failure of T4803F601 has no effect on the Level 2 PSA results and the success criteria for penetration X-26 is met and, therefore, failure of T4803F601 is not risk significant.

In conjunction with the discretion requested, the licensee committed to the following compensatory actions:

1. Isolation valves T4800F407 and T4800F408 (both normally closed) will remain closed and be deactivated, assuring the valves remain closed until T4803F601 is repaired. T4800F407 and T4800F408 will not be cycled until the plant is shutdown to repair T4803F601.
2. Isolation valves T4800F407 and T4800F408 will be verified closed every 31 days.
3. Because the leakage through the outboard isolation valves cannot be individually quantified, a flanged cover will be installed over the opening of T4800F407 by September 28, 1999², to provide an additional leakage barrier. This flange will remain in place until the plant is shut down to correct the penetration leakage.

¹ In simple terms, the Level 1 PSA evaluates the response of the plant to transients, expressed in the form of core damage frequency. The Level 2 PSA evaluates the containment response to the events developed in the Level 1 PSA.

² This flanged cover was installed on September 25, 1999.

4. Leak testing of this penetration will be performed at least every 45 days to verify that the $0.6 L_a$ is not exceeded due to additional penetration leakage. This testing will also qualitatively verify the integrity of the outboard isolation barriers (employing Snoop and visual and audio inspection techniques similar to those used on September 22, 1999, as described above).

The licensee concluded that the proposed action will not change the types or amounts of effluents that may be released offsite, nor increase individual or cumulative occupational radiation exposures, since the proposal is expected to maintain the overall leakage of the penetration within the required limits.

The NRC staff verbally granted a Notice of Enforcement Discretion (NOED) at 5:30 p.m. eastern daylight time on September 23, 1999. By letter dated September 27, 1999, the staff documented its issuance of the NOED. The licensee requested an exigent license amendment on September 24, 1999, to modify TS 3.6.1.8 to incorporate the actions agreed upon in the NOED.

3.0 EVALUATION

The licensee proposed to add a footnote "***" to TS 3.6.1.8, Action b to allow continued operation of Fermi 2 with the leakage for penetration X-26 exceeding the limit in TS 4.6.1.8.2. Operation may continue until the next plant shutdown, provided

- T4800F407 and T4800F408 are closed and deactivated,
- a flanged cover is placed over the open end of T4800F407,
- T4800F407 and T4800F408 are verified closed and deactivated every 31 days, and
- Leakage testing is performed on penetration X-26 at least every 45 days to verify that the limit of $0.6 L_a$ is not exceeded and to allow qualitative testing of the outboard valves.

There are two branches in the outboard portion of penetration X-26. One branch is isolated by T4800F408 and the other branch is isolated by T4800F407. These two branches will be discussed individually.

Based on the information provided, the staff concludes that the Snoop testing results for outboard valve T4800F408 provide reasonable assurance that this valve is currently leak-tight. Maintaining this valve closed and deactivated will provide an acceptable containment boundary as long as the valve seal does not degrade. In addition, because these valves are in a mild environment, the most likely cause of seal degradation is mechanical failure caused by stroking the valve. Maintaining the valve closed eliminates this failure mechanism. The periodic leakage testing of penetration X-26 will alert the licensee to any degradation in the valve seal caused by other mechanisms. Therefore, the NRC staff concludes that the TS change is acceptable for this branch of the penetration.

The situation for the other branch of the penetration, containing T4800F407, is similar to that described for T4800F408 and the same arguments can be applied. However, unlike T4800F408, the leakage rate through T4800F407 was not zero based on the qualitative testing.

While the licensee estimated that the leakage through T4800F407 was very low, the compensatory action of adding a blank flange to the end of that pipe will provide further assurance that there is little or no leakage through this portion of the penetration. The blank flange was installed on September 25, 1999. Based on the compensatory actions, the NRC staff concludes that the TS change is acceptable for this branch of the penetration.

Finally, the footnote specifically requires that the leakage for penetration X-26 be restored within limits prior to startup from the next plant shutdown. This requirement, as written, encompasses both planned and unplanned shutdowns.

The staff issued the ITS (Amendment No. 134) on September 30, 1999. The licensee provided an ITS version of the proposed TS change in its submittal. The change adds a new special operations TS, ITS 3.10.8, to address the same issues addressed in the proposed footnote "" to current TS 3.6.1.8, Action b.

ITS 3.10.8 would modify ITS 3.6.1.3, "PCIVs," to exclude penetration X-26 flow paths for purge valve leakage rate not within limits, provided

- T4800F407 and T4800F408 are closed and deactivated,
- a flanged cover is placed over the open end of T4800F407, and
- the special operations allowance is withdrawn on the first entry into Mode 2 (startup³) or Mode 3 (hot shutdown).

A note to the limiting condition for operation (LCO) states that, upon exiting the LCO, the 24-hour completion time for inoperable purge valves allowed in ITS 3.6.1.3 Required Action D.1 is considered expired for purge valve leakage not within limits. In other words, the licensee would immediately enter the shutdown action in ITS 3.6.1.3.

The ITS version also adds two surveillance requirements (SRs). SR 3.10.8.1 requires the licensee to verify that T4800F407 and T4800F408 are closed and deactivated every 31 days. SR 3.10.8.2 requires the licensee to perform an LLRT of penetration X-26 every 45 days and compare the results to the 0.6 L_a limit provided in ITS 3.6.1.1. A note to the frequencies for these two SRs states that SR 3.0.2 is not applicable. This means that the licensee is not permitted to apply a 25-percent tolerance to the frequencies of the SRs.

The NRC staff concludes that the proposed ITS version provides the same requirements as the current TS version. Therefore, as discussed above, these changes are acceptable.

4.0 EXIGENT CIRCUMSTANCES

The Commission's regulations at 10 CFR 50.91 contain provisions for issuance of amendments where the Commission finds that exigent circumstances exist, in that a licensee and the Commission must act quickly and that time does not permit the Commission to publish a

³ This mode is entered below approximately 15-percent power. Including this mode in the requirements ensures consistency with the requirements in the current TSs.

Federal Register notice allowing 30 days for prior public comment before issuance of an amendment. The exigency exists in this case in that the proposed amendment is needed because Fermi 2 is operating under a NOED, and time does not permit the Commission to publish a notice allowing 30 days for prior public comment.

In its application, the licensee explained why it could not have foreseen the need for this amendment. The amendment is required to allow continued plant operation after penetration X-26 unexpectedly failed its LLRT on September 22, 1999. Based on the data it collected, the licensee believes the high leakage is passing through inboard containment isolation valve T4803F601. The results of previous LLRTs had not indicated any adverse trend in the leak-tightness of this penetration. In accordance with NRC procedures described in NRC Inspection Manual, Part 9900, Notices of Enforcement Discretion, dated June 29, 1999, the licensee applied for this license amendment within 48 hours after the NRC staff verbally issued the NOED on September 23, 1999.

Accordingly, the Commission has determined that exigent circumstances exist pursuant to 10 CFR 50.91(a)(6), the submittal of information was timely, and the licensee did not create the exigency.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATIONS DETERMINATION

The Commission's regulations in 10 CFR 50.92(c) state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) result in a significant reduction in the margin of safety. The NRC staff has made a final determination that no significant hazards consideration is involved for the proposed amendment and that the amendment should be issued as allowed by the criteria contained in 10 CFR 50.91. The NRC staff's final determination is presented below.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change provides an exception for Drywell Air Purge penetration X-26 to TS 3.6.1.8, Action b, to allow continued operation with inboard isolation valve T4803F601 exceeding the leakage rate limit. Valve T4803F601 is not an initiator of an event or involved in an accident initiation sequence. Therefore, the proposed change does not involve an increase in the probability of an accident.

Either T4803F601 or the outboard isolation valves must close to isolate penetration X-26. With the penetration isolated by the outboard isolation valves and a blank flange, as required by the proposed change, failure of T4803F601 would involve no significant increase in the consequences of an accident since the containment function is preserved.

Therefore, the proposed change does not involve an increase in the probability or consequences of an accident.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Valve T4803F601 is an inboard containment isolation valve. The safety function of the valve is to provide for containment penetration X-26 postaccident isolation. Valve T4803F601 and two outboard isolation valves (T4800F407 and T4800F408) comprise the penetration's isolation capability. The valves' safety function is to close and remain closed. The outboard isolation valves are normally closed isolation valves that will be closed and deactivated by the proposed change. Therefore, no new or different types of failures or accident initiators are introduced by the proposed change.

3. The change does not involve a significant reduction in the margin of safety.

Operating with excessive leakage on T4803F601 places additional reliance on T4800F407 and T4800F408, as they would be the single containment barrier. The change includes closing and deactivating the outboard containment isolation valves and adding a blank flange outboard of T4800F407 to provide assurance the penetration is isolated. Closing and deactivating these valves eliminates the potential that any active failure could lead to loss of function. Previous leak performance and ongoing periodic leak testing minimize the potential that passive failures would occur for these valves undetected. The change does not involve a new mode of operation or change to the transient analyses in the Updated Final Safety Analysis Report. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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 surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendment involves no significant hazards consideration. Accordingly, the 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 the amendment.

8.0 CONCLUSION

The Commission has 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 (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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