

50-344



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

September 10, 1997

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

SUBJECT: FERMI-2 - ISSUANCE OF AMENDMENT RE: RELOCATION OF ITEMS FROM
THE ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL
SPECIFICATIONS (TAC NO. M91189)

Dear Mr. Gipson:

The Commission has issued the enclosed Amendment No. 113 to Facility Operating License No. NPF-43 for the Fermi-2 facility. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated December 15, 1994 (NRC-94-0107) as revised by your letter dated July 25, 1996 (NRC-96-0064) and supplemented by your letters dated December 13, 1996 (NRC-96-0125) and June 18, 1997.

The amendment revises TS Section 6.0, Administrative Controls, by removing requirements that are adequately controlled by existing regulations other than 10 CFR 50.36 and the TS. The amendment also relocates selected requirements from TS Section 6.0 to licensee-controlled documents or programs (e.g., the final safety analysis report or the quality assurance plan). Guidance on the proposed changes was developed by the NRC and provided in the Standard Technical Specifications (STS) for BWR/4 Plants, NUREG-1433, and Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995.

In approving the proposed action, the staff relied upon your commitment to relocate the selected requirements from TS Section 6.0 into certain licensee-controlled documents within 90 days of the date of this amendment, as described in your application dated December 15, 1994, as revised on July 25, 1996, and supplemented on December 13, 1996, and June 18, 1997, and evaluated in the enclosed Safety Evaluation. The information related to the commitment that you agreed to and provided in the June 18, 1997, letter is incorporated in the paragraphs of the amendment that describe the changes and the implementation of the amendment.

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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
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures: 1. Amendment No. 113to NPF-43
2. Safety Evaluation

cc w/encl: See next page

DISTRIBUTION: See attached page

DOCUMENT NAME: G:\WPDOCS\FERMI\FE91189.AMD *SEE PREVIOUS CONCURRENCE

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DATED: September 10, 1997

AMENDMENT NO. 113 TO FACILITY OPERATING LICENSE NO. NPF-43-FERMI-2

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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. 113
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 December 15, 1994, as revised on July 25, 1996, and supplemented on December 13, 1996, and June 18, 1997, 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, Facility Operating License No. NPF-43 is hereby amended to approve the removal of selected requirements from TS Section 6.0, Administrative Controls, and the relocation of other requirements into licensee-controlled documents or programs (e.g., the updated final safety analysis report (UFSAR) or the quality assurance plan) as described in the licensee's application dated December 15, 1994, as revised on July 25, 1996, and supplemented on December 13, 1996, and June 18, 1997, and evaluated in the staff's safety evaluation attached to this amendment. Implementation will be completed within 90 days of the issuance of this amendment. With respect to changes to the UFSAR, the action that must be completed within the implementation date is the licensee approval of the UFSAR change documentation. This license is also hereby 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. 113, 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 the date of its issuance with full implementation within 90 days. Implementation of this amendment shall include the relocation of technical specification requirements to the appropriate licensee-controlled documents, as described in the licensee's application dated December 15, 1994, as revised on July 25, 1996, and supplemented on December 13, 1996, and June 18, 1997, and evaluated in the staff's safety evaluation attached to this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION



Andrew J. Kugler, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 10, 1997

ATTACHMENT TO LICENSE AMENDMENT NO. 113

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.

REMOVE

xix
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1-3
1-4
3/4 7-19
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6-1
6-2
6-2a
6-5
6-6
6-7
6-8
6-9
6-10
6-11
6-12
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6-15
6-16
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6-18
6-21
6-22
6-22a
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6-24

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6-10
6-11
6-12
6-13
6-14
6-15
6-16
6-16b
6-17*
6-18
6-21
6-22
6-22a
6-23
6-24

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

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 RESPONSIBILITY</u>	6-1
<u>6.2 ORGANIZATION</u>	6-1
6.2.1 OFFSITE AND ONSITE ORGANIZATIONS.....	6-1
6.2.2 UNIT STAFF.....	6-1
6.2.3 DELETED.....	6-6
6.2.4 SHIFT TECHNICAL ADVISOR.....	6-6
<u>6.3 UNIT STAFF QUALIFICATIONS</u>	6-7
<u>6.4 DELETED</u>	6-7
<u>6.5 DELETED</u>	6-7

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.6 DELETED</u>	6-13
<u>6.7 SAFETY LIMIT VIOLATION</u>	6-14
<u>6.8 PROCEDURES AND PROGRAMS</u>	6-14
<u>6.9 REPORTING REQUIREMENTS</u>	6-16c
6.9.1 ROUTINE REPORTS.....	6-16c
STARTUP REPORT.....	6-16c
ANNUAL REPORTS.....	6-17
MONTHLY OPERATING REPORTS.....	6-18
ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT..	6-18
ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT.....	6-18
6.9.2 SPECIAL REPORTS.....	6-21
6.9.3 CORE OPERATING LIMITS REPORT.....	6-21
<u>6.10 DELETED</u>	6-21
<u>6.11 DELETED</u>	6-22a
<u>6.12 HIGH RADIATION AREA</u>	6-22a
<u>6.13 DELETED</u>	6-23
<u>6.14 OFFSITE DOSE CALCULATION MANUAL</u>	6-24

DEFINITIONS

FREQUENCY NOTATION

- 1.14 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

IDENTIFIED LEAKAGE

- 1.15 IDENTIFIED LEAKAGE shall be:

- a. Leakage into collection systems, such as pump seal or valve packing leaks, that is captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of the leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

ISOLATION SYSTEM RESPONSE TIME

- 1.16 The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the isolation valves travel to their required positions. Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

LIMITING CONTROL ROD PATTERN

- 1.17 A LIMITING CONTROL ROD PATTERN shall be a pattern which results in the core being on a thermal hydraulic limit, i.e., operating on a limiting value for APLHGR, LHGR, or MCPR.

LINEAR HEAT GENERATION RATE

- 1.18 LINEAR HEAT GENERATION RATE (LHGR) shall be the heat generation per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.

LOGIC SYSTEM FUNCTIONAL TEST

- 1.19 A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc., of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total system steps such that the entire logic system is tested.

MAXIMUM FRACTION OF LIMITING POWER DENSITY

- 1.20 The MAXIMUM FRACTION OF LIMITING POWER DENSITY (MFLPD) shall be the highest value of the FLPD which exists in the core.

MEMBER(S) OF THE PUBLIC

- 1.21 MEMBER(S) OF THE PUBLIC shall be an individual in a controlled or UNRESTRICTED AREA. However, an individual is not a MEMBER OF THE PUBLIC during any period in which the individual receives an occupational dose.

DEFINITIONS

MINIMUM CRITICAL POWER RATIO

1.22 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core.

OFF-GAS TREATMENT SYSTEM

1.23 An OFF-GAS TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting reactor coolant system offgases from the reactor coolant and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

OFFSITE DOSE CALCULATION MANUAL

1.24 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls required by Section 6.8.5 and Radiological Environmental Monitoring Programs and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

OPERABLE - OPERABILITY

1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL CONDITION - CONDITION

1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

PHYSICS TESTS

1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.28 PRESSURE BOUNDARY LEAKAGE shall be leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall.

PRIMARY CONTAINMENT INTEGRITY

1.29 PRIMARY CONTAINMENT INTEGRITY shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure as far as practical that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

f. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

- 1) Activation (restraining action) is achieved within the specified range in both tension and compression;
- 2) Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range;
- 3) For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and
- 4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen-in-place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.5e. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Seal Replacement Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained.

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 Senior Vice President - Nuclear Generation* shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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 - Nuclear Generation 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.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

ADMINISTRATIVE CONTROLS

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;
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor. The Radiation Protection Technician position may be unfilled 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;
- 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. DELETED
- f. DELETED
- 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.

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

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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
NPPD/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
- NPPD/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.

6.2.3 DELETED

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.

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.

6.4 DELETED

6.5 DELETED

* An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

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ADMINISTRATIVE CONTROLS

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ADMINISTRATIVE CONTROLS

6.6 DELETED

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 Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group (NSRG) shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Onsite Review Organization (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 Senior Vice President - Nuclear Generation 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. DELETED
- f. DELETED
- 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 DELETED

6.8.3 DELETED

6.8.4 DELETED

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. DELETED

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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.

e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR Part 20.1001-20.2402, Appendix B, Table 2, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

f. DELETED

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(O) and 10 CFR 50, Appendix J, Option B as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 56.5 psig.

The maximum allowable primary containment leakage rate, L_a , shall be 0.5% of primary containment air weight per day at P_a .

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

6.8.6 Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by 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 his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

ADMINISTRATIVE CONTROLS

STARTUP REPORT (Continued)

obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of plant, utility, and other personnel (including contractors), for whom monitoring was required, receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket or thermoluminescent dosimeters (TLD) dosimeters or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions; and
- b. Documentation of all challenges to main steam line safety/relief valves, and
- c. A summary of ECCS outage data including:
 1. ECCS outage dates and duration of outages,
 2. Cause of each ECCS outage,
 3. ECCS systems and components in the outage, and
 4. Corrective action taken.
- d. The reports shall also include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included:

*This tabulation supplements the requirements of §20.2206 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

- (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded;
- (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit (each result should include date and time of sampling and the radioiodine concentrations);
- (3) clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded;
- (4) graph of the I-131 and one other radioiodine isotope concentrations in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and
- (5) the time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

CORE OPERATING LIMITS REPORT

6.9.3 Selected cycle specific core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in General Electric Company reports NEDE-24011-P-A and NEDE-23785-1-PA. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The COLR, including any mid-cycle revisions or supplement thereto, shall be submitted upon issuance to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector prior to use.

6.10 DELETED

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ADMINISTRATIVE CONTROLS

6.11 DELETED

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20. 1601 of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

*Radiation Protection personnel or personnel escorted by radiation protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

HIGH RADIATION AREA (Continued)

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A radiation protection qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Supervisor** in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose equivalent greater than 1000 mrem but less than 500 rads at one meter from sources of radioactivity shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Nuclear Shift Supervisor on duty and/or the radiation protection supervision. Doors shall remain locked except during periods of access by individuals under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to individuals with radiation levels such that a major portion of the individual's body could receive in 1 hour a dose in excess of 1000 mrem* but less than 500 rads at one meter from sources of radioactivity that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 DELETED

*Measurement made at 30 centimeters from source of radioactivity.

** An alternative title may be designated for this position. All requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Alternative titles shall be specified in the Updated Final Safety Analysis Report.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO.113 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated December 15, 1994, as revised by a letter dated July 25, 1996, and supplemented by letters dated December 13, 1996, and June 18, 1997, the Detroit Edison Company (DECo or the licensee) requested an amendment to the Technical Specifications (TS) appended to Facility Operating License No. NPF-43 for Fermi-2. The proposed amendment would revise TS Section 6.0, Administrative Controls, by removing requirements that are adequately controlled by existing regulations other than 10 CFR 50.36 and the TS. The amendment also relocates selected requirements from TS Section 6.0 to licensee-controlled documents or programs (e.g., the final safety analysis report or the quality assurance plan). Guidance on the proposed changes was developed by the NRC and provided in the Standard Technical Specifications (STS) for BWR/4 Plants, NUREG-1433, and Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995.

The December 13, 1996, and June 18, 1997, letters provided clarifying information within the scope of the original application and did not change the staff's initial proposed no significant hazards considerations determination. The information related to the commitment that DECo agreed to and provided in the June 18, 1997, letter is incorporated in the paragraphs of the amendment that describe the changes and the implementation of the amendment.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state technical specifications to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission recently adopted amendments to 10 CFR 50.36 (Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995)), pursuant to which the rule was revised to

codify and incorporate four criteria to be used in determining whether a particular matter is required to be included in an LCO. While the criteria specifically apply to LCOs, in adopting the revision to the rule the Commission noted that the staff had used the intent of these criteria to identify the optimum set of administrative controls in the TS (60 FR 36957).

10 CFR 50.36 states that Administrative Controls "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is therefore that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has determined that requirements that are not specifically required under 10 CFR 50.36(c)(5) and that are not otherwise necessary for operation of the facility in a safe manner, can be removed from administrative controls.

3.0 EVALUATION

The following discussions detail the staff's conclusions regarding the removal or relocation of selected administrative controls from the Fermi-2 TS. The changes were reviewed in accordance with the guidance provided in, or planned for, the STS, NUREG-1433. In addition, these changes were reviewed in accordance with the guidance provided in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995.

The licensee submitted a revision to the TS index with the proposed changes. The changes to the index are administrative in nature and are acceptable. The staff also notes that the proposal to delete Section 6.12 concerning high radiation areas, which was proposed in the December 15, 1994, was withdrawn by the July 25, 1996, submittal.

License amendment requests should contain a commitment to relocate each selected requirement to a particular licensee-controlled document or program (e.g., the final safety analysis report (FSAR) or the quality assurance (QA) plan). The commitment should also address the submittal of the revised documents to the NRC in accordance with the applicable regulation (e.g., 10 CFR 50.71(e)). In the amendment request, the licensee should clearly describe the program it will use to control changes to relocated requirements (e.g., 10 CFR 50.59 or 50.54(q)). Control of the relocated requirements in accordance with the applicable regulation ensures that NRC review and approval will be proposed for changes exceeding the stated regulatory threshold (e.g., an unreviewed safety question or a decrease in effectiveness). Elimination of reporting requirements that are recommended for relocation or removal from the TS can be proposed if they are not required by 10 CFR 50.72, 10 CFR 50.73, or other regulations.

a. Staff Work Hour Limitations

The licensee has proposed that the specific limits on nuclear plant staff working hours in TS 6.2.2.f be replaced with a general requirement in the administrative controls for a procedure to establish and maintain working hour limits.

On February 18, 1982, the NRC published the "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" (47 FR 23836). In June 1982, the NRC revised the policy and subsequently disseminated the revision in Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours," which recommended that licensees incorporate specific working hour limits in the TS to minimize the potential for personnel errors resulting from fatigue. The staff subsequently determined that few events at U.S. nuclear plants have been attributed to inadequate control of working hours, and that licensees can adequately control working hours with administrative procedures. This approach is consistent with Action Item I.A.1.3.1, "Limit Overtime," of NUREG-0737, "Clarification of TMI Action Plan Requirements."

This change from specific working hour limits to administrative procedures to control working hours will provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation. Specific working hour limits are not otherwise required to be in the TS under 10 CFR 50.36(c)(5) and are not important to the detection, prevention, or mitigation of an event. The staff concludes that the specific controls for working hours of reactor plant staff can be described in a licensee procedure that requires a deliberate decisionmaking process to minimize the potential for impaired personnel performance, and that a licensee's established procedure control processes will provide sufficient control for changes to that procedure. Therefore, the staff finds that this change to TS 6.2.2.f is acceptable.

b. Independent Safety Engineering Group (ISEG)

The TS related to ISEG (TS section 6.2.3) resulted from the NUREG-0737, "Clarification of TMI Action Plan Requirements," requirements to establish an on-site independent safety engineering group to perform independent reviews of plant operations. The current TS requirements reflect the NUREG-0737 requirements defining the function, composition, responsibilities and records associated with the ISEG organization. The licensee has proposed to relocate these TS requirements to the QA Program (QAP) and control any subsequent changes in accordance with 10 CFR 50.54(a). In addition, the licensee proposed to change the title of the individual to whom ISEG reports. The licensee provided a revised QAP as part of this request and the staff has verified that the commitments incorporated into the QAP adequately address the relocated TS requirements.

The staff has concluded that the relocation of ISEG requirements is acceptable because (1) their inclusion in TS is not specifically required by 10 CFR 50.36 or other regulations, (2) the ISEG requirements are not required to avert an immediate threat to the public health and safety, and (3) changes to the ISEG provisions that were incorporated into the QAP without change are adequately controlled in accordance with 10 CFR 50.54(a). On this basis, the staff finds the proposed relocation of ISEG requirements to the QAP to be acceptable.

The current TS 6.2.3.4 requires that "detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety" shall be made to the Vice President Nuclear Engineering Services. The position title has been changed to Nuclear Assessment Manager. This is an administrative change that does not change the responsibility level in the Fermi management organization. This change does not eliminate any qualifications, responsibilities, or

requirements for the person or their position; the change is a presentation change only. Specifying plant position titles in the TS is not required to provide protection of the public health and safety, and therefore this change is acceptable.

c. Training and Unit Staff Qualifications

The licensee proposed to remove the training requirements in existing TS 6.4 and revise the unit staff qualification TS section 6.3.

The requirements for training are adequately addressed by other administrative controls and the regulations. Section 50.54 of 10 CFR describes the minimum shift crew composition and delineates which positions require a reactor operator (RO) or a senior reactor operator (SRO) license. Training and requalification of those positions are as specified in 10 CFR Part 55. The retained administrative controls TS on "Unit Staff Qualifications" provides adequate requirements to assure a competent operating staff. The administrative controls TS on "Organization" describes the details of the required qualifications. The FSAR describes the details of the training program.

The staff concludes that the regulatory requirements in 10 CFR 50.54 and Part 55 provide sufficient controls for the training provisions and removing them from the TS is acceptable.

d. Review and Audit

The licensee proposed that the existing requirements in TS 6.5 related to review and audit functions be relocated to the QAP implementing 10 CFR Part 50, Appendix B, except with respect to those associated with the security and emergency plans which, as described in Section f. below are being relocated to their respective plans.

Given that the requirements in the QAP implement the Commission's regulations pertaining to the review and audit functions, inclusion of these particular provisions in TS is not necessary to assure safe operation of the facility. The review and audit functions define an administrative framework to confirm that plant activities have been properly conducted in a safe manner. The reviews and audits serve also to provide a cohesive program that provides senior level utility management with assessments of facility operation and recommends actions to improve nuclear safety and reliability. However, the staff has determined that the review and audit functions are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the review and audit provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

Audit requirements are specified in the QAP to satisfy 10 CFR Part 50, Appendix B, Criterion XVIII. Audits are also covered by ANSI N18.7, ANSI N45.2, 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR Part 73.

The licensee has proposed to relocate the provisions in the existing TS to the QAP without change. The licensee has committed to incorporate a 2-year limit on performance-based audit schedules, in accordance with ANSI N18.7, and retain the existing frequency for audits

of the fire protection program on a fixed basis in accordance with GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

The licensee will continue to implement a QAP in accordance with the requirements of 10 CFR Part 50, Appendix B, and commitments to ANSI N18.7, which provides appropriate controls for the approval of changes to the audit functions and frequencies. Changes to the QAP are controlled in accordance with 10 CFR 50.54(a) and include requirements for prior NRC review and approval if a change constitutes a reduction in a QAP commitment. The staff concludes that this regulatory requirement provides sufficient control for the audit functions and frequencies, so that removing these requirements from the TS is acceptable.

e. Reportable Event Action

The licensee has proposed that the requirement in TS 6.6, concerning the notification of the Commission of all reportable events, be deleted from the TS on the basis that this requirement is adequately addressed in the regulations. Requirements are provided in 10 CFR 50.73(a)(2) for the licensee to submit a Licensee Event Report (LER) for all reportable events specified in 10 CFR 50.73. The staff concludes that these reporting requirements are sufficient and removing the duplicative reporting requirements from the TS is acceptable.

f. Security Plan Implementation and Emergency Plan Implementation

The licensee proposed removal of the administrative controls TS 6.5.1.6.j, TS 6.5.1.6.k, TS 6.8.1.e and TS 6.8.1.f for the review and implementation of the Security Plan and the Emergency Plan, as recommended in GL 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans." Since the Security Plan requirements are specified in 10 CFR 50.54, 73.40, 73.55 and 73.56, and the Emergency Plan requirements are specified in 10 CFR 50.54 and 10 CFR Part 50, Appendix E, Section V, the staff concluded that these requirements should be removed from the TS and relocated to their respective plans.

Changes in these review requirements must be made in accordance with 10 CFR 50.54(p) for the Security Plan and 10 CFR 50.54(q) for the Emergency Plan. The staff concludes that this change to the plans, in conjunction with the requirements for emergency planning in 10 CFR 50.47 and 50.54, and for security in 10 CFR 50.54 and 73.55 for drills, exercises, testing, and maintenance of the program, provide sufficient controls for the review and implementation of the Security Plan and the Emergency Plan. Therefore, removing these duplicate provisions from the TS is acceptable.

g. Review and Approval Process and Temporary Change Process

The licensee proposed to relocate the requirements, without change, for both the review and approval process in TS 6.8.2, TS 6.8.3, and the temporary change process for procedures in TS 6.8.4 to the QAP.

The revised TS will include a specific requirement that written procedures be established, implemented, and maintained, and a requirement for procedure control is mandated by

10 CFR Part 50, Appendix B, Criterion II and Criterion V. ANSI N18.7-1976, which is an NRC staff-endorsed document used in the development of many licensee QA programs, also contains specific requirements related to procedures. The licensee has committed to follow ANSI N18.7-1976 as a means to comply with 10 CFR Part 50, Appendix B. ANSI N18.7-1976, Section 5.2.2 discusses procedure adherence. This section clearly states that procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing. ANSI N18.7-1976 also discusses temporary changes to procedures and requires review and approval of procedures to be defined. ANSI N18.7-1976, Section 5.2.15, describes the review, approval, and control of procedures. This section describes the requirements for the licensee's QAP to provide measures to control and coordinate the approval and issuance of documents, including changes thereto, which prescribe all activities affecting quality. The section further states that each procedure shall be reviewed and approved prior to initial use. The required reviews are also described. ANSI N45.2-1971, Section 6, also specifies that the QAP describe procedure requirements.

The provisions in the QAP implement the Commission's regulations pertaining to the control of documents such as instructions, procedures, and drawings, including changes thereto. The procedure review and approval functions currently in TS define an administrative framework to ensure that documents are reviewed for adequacy and approved for release by authorized personnel. The required control of these processes in the regulations and revised QAP is considered to be redundant and functionally equivalent to the provisions currently in TS. The staff has determined that the procedure review and approval functions are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the procedure review provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The licensee will continue to implement a QAP in accordance with the requirements of 10 CFR Part 50, Appendix B, which provides appropriate controls for the review and approval of procedure changes. The staff concludes that these regulatory requirements provide sufficient control of these provisions and removing them from the TS is acceptable. Future changes to the review and approval process for procedure changes can be adequately controlled under 10 CFR 50.54(a).

h. In-Plant Radiation Monitoring Program

The licensee proposed to relocate the requirements in existing TS 6.8.5.b related to the In-Plant Radiation Monitoring Program to Chapter 12 of the Updated Final Safety Analysis Report (UFSAR).

The In-Plant Radiation Monitoring Program provides controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program was developed to minimize radiation exposure to plant personnel (post-accident). The In-Plant Radiation Monitoring Program administrative control does not involve monitoring process variables that are initial conditions for a design-basis transient or a design-basis accident (DBA), nor does it involve a primary success path to mitigate a DBA. The staff concludes that these provisions do not satisfy the criteria for TS content for inclusion elsewhere in the TS, nor are these provisions required to be in the TS under

10 CFR 50.36(c)(5). Therefore, the staff concludes that these provisions may be relocated to the UFSAR and 10 CFR 50.59 provides adequate control for future changes to the In-Plant Radiation Monitoring Program.

i. Radiological Environmental Monitoring Program

The licensee proposed to relocate the requirements in existing TS 6.8.5.f related to the Radiological Environmental Monitoring Program to Chapter 11.6 of the UFSAR. The licensee also proposed to make related changes to Definition 1.24, "Offsite Dose Calculation Manual."

The existing Radiological Environmental Monitoring Program requires that procedures be prepared for monitoring the radiation and radionuclides in the environs of plants, consistent with the guidance specified in 10 CFR Part 50, Appendix I. These procedures were developed to ensure that radioactive effluents are restricted to levels as low as reasonably achievable and have no impact on plant nuclear safety. The program is a redundant verification of the effectiveness of the effluent monitoring program contained in the Offsite Dose Calculation Manual (ODCM). With its relocation to the UFSAR, any changes to the Radiological Environmental Monitoring Program requirements would be subject to review in accordance with 10 CFR 50.59. This ensures that any future changes would be evaluated to confirm that they do not involve an unreviewed safety question. The process also ensures that any changes would be documented and included in a UFSAR revision and the Safety Evaluation Summary Reports that are submitted to the NRC pursuant to 10 CFR 50.71(e) and 10 CFR 50.59(b). The staff concludes that the provisions of the TS for the Radiological Environmental Monitoring Program do not satisfy the criteria for TS content for inclusion elsewhere in the TS, nor are these provisions required to be in the TS under 10 CFR 50.36(c)(5). Therefore, the staff concludes that the requirements in 10 CFR 50.59, 10 CFR 20.1302, 40 CFR Part 190, and 10 CFR Part 50, Appendix I, provide sufficient control of these provisions and relocating them from the TS to the UFSAR is acceptable.

The licensee proposed changes to Definition 1.24, "Offsite Dose Calculation Manual," to reflect (1) the relocation of the Radiological Environmental Monitoring Program out of TS 6.8.5 and (2) the fact that the radiological effluent release reports are annual as opposed to semiannual. The staff concludes that these changes are administrative in nature and are acceptable.

j. Record Retention

The licensee proposed that the requirements for record retention in TS 6.10 be relocated to the QAP without change, because they are adequately addressed by 10 CFR Part 50, Appendix B, Criterion XVII.

The provisions in the QAP implement the Commission's regulations pertaining to the maintenance of records related to activities affecting quality. The required controls related to record retention specified in various regulations and the provision incorporated into the QAP are considered to be redundant to the requirements currently in TS. The staff has determined that record retention requirements are adequately addressed by existing

regulations and the related QAP commitments. Based upon the relocation of the record retention provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The staff concludes that the regulatory requirements under 10 CFR Part 50, Appendix B, provide sufficient control of the plant records, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a). In addition, numerous other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant. The staff concludes that these regulatory requirements provide sufficient control of these recordkeeping provisions and removing them from the TS is acceptable.

k. Radiation Protection Program

The licensee proposed to relocate the requirements in existing TS 6.11 related to the Radiation Protection Program to Chapter 13.5 of the UFSAR.

The existing TS for the Radiation Protection Program requires procedures to be prepared for personnel radiation protection consistent with the requirements of 10 CFR Part 20. The requirement for procedures to implement Part 20 is also contained in 10 CFR 20.1101(b). Periodic review of these procedures is addressed under 10 CFR 20.1101(c). With its relocation to the UFSAR, any changes to the Radiation Protection Program requirements would be subject to review in accordance with 10 CFR 50.59. This ensures that any future changes would be evaluated to confirm that they do not involve an unreviewed safety question. The process also ensures that any changes would be documented and included in a UFSAR revision and the Safety Evaluation Summary Reports that are submitted to the NRC pursuant to 10 CFR 50.71(e) and 10 CFR 50.59(b). The staff concludes that the provisions of the TS for the Radiation Protection Program do not satisfy the criteria for TS content for inclusion elsewhere in the TS, nor are these provisions required to be in the TS under 10 CFR 50.36(c)(5). Therefore, the staff concludes that the requirements for the Radiation Protection Program do not have to be controlled by TS, changes to the Radiation Protection Program are adequately controlled by 10 CFR Part 20, 10 CFR 50.54, 10 CFR 50.59, and 10 CFR Part 50, Appendix B, and relocating them from the TS to the UFSAR is acceptable.

l. Process Control Program

The licensee proposes to remove the Process Control Program (PCP) in TS 6.13, because the PCP approval and revision process is adequately controlled under the QAP. The PCP implements the requirements of 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71.

The staff concludes that the regulatory requirements under 10 CFR Part 50, Appendix B, provide sufficient control of the PCP, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a), such that removing these provisions from the TS is acceptable.

m. Annual Radioactive Effluent Release Report

The licensee proposes to revise the Annual Radioactive Effluent Release Report submittal date requirement, currently included in TS 6.9.1.8. The present requirement will be revised in the TS (i.e., "...within 90 days after January 1...") would be revised to read, "...prior to May 1...." This revision to the submittal date is consistent with similar annual reporting requirements in the STS, has no safety significance, and is purely an administrative change. The change in submittal date is acceptable to the NRC staff.

n. Summary

In conclusion, the existing TS requirements relating to administrative controls that have been deleted or relocated are not required to be in the TS under 10 CFR 50.36 or Section 182a of the Atomic Energy Act, are governed by other regulations such as 10 CFR Part 20, 10 CFR 50.4, 50.47, 50.48, 50.54, 50.55, 50.59, 50.71, 50.72, 50.73, Part 50 Appendix A, Part 50 Appendix B, Part 50 Appendix E, Part 50 Appendix I, Part 55, Part 73, or 40 CFR Part 190 and therefore are not necessary to the safe operation of the facility. Thus, the relocated provisions do not meet the intent of the four criteria described in the Commission's regulations in 10 CFR 50.36(c)(2). In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.59 and 50.54(a) to control future changes to the relocated provisions. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the above specified documents. However, it is noted that both the TS and the QAP changes described in the licensee's July 25, 1996, letter and supplemented by correspondence dated December 13, 1996, and June 18, 1997, should be implemented simultaneously. Finally, the staff concludes that the administrative control requirements remaining in the TS satisfy the license content specified in 10 CFR 50.36(c)(5).

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, and administrative procedures and 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.

6.0 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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