

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

December 23, 1996

SUBJECT: FERMI-2 - ISSUANCE OF AMENDMENT RE: TESTING OF CONTROL ROOM
 EMERGENCY FILTRATION SYSTEM AND STANDBY GAS TREATMENT SYSTEM
 (TAC NO. M95116)

Dear Mr. Gipson:

The Commission has issued the enclosed Amendment No. 110 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 letter dated March 25, 1996 (NRC-96-0003).

The TS amendment changes the testing requirements used to determine the operability of the charcoal in the air handling units in engineered safety features systems. Specifically, changes have been made to Surveillance Requirements 4.6.5.3.b.2, 4.6.5.3.c, 4.7.2.1.c.2, and 4.7.2.1.d, in TS 3/4.6.5.3 "Standby Gas Treatment System (SGTS)" and TS 3/4.7.2 "Control Room Emergency Filtration System (CREFS)". There are no changes to the physical design or operation of the facility. The TS Bases and the Updated Final Safety Analysis Report (UFSAR) design basis are not affected.

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.110 to NPF-43
 2. Safety Evaluation

cc w/encl: See next page

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

December 23, 1996

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

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Sincerely,

A handwritten signature in cursive script, reading "Andrew J. Kugler".

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. 110 to NPF-43
2. Safety Evaluation

cc w/encl: See next page

Mr. Douglas R. Gipson
Detroit Edison Company

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. 110
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 March 25, 1996, 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. 110, 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 45 days.

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: December 23, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 110

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

3/4 6-55
3/4 6-56*
3/4 7-9
3/4 7-10*

INSERT

3/4 6-55
3/4 6-56*
3/4 7-9
3/4 7-10*

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

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the subsystem by:
1. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 3800 cfm \pm 10%.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 with a 6 inch bed; and
 3. Verifying a subsystem flow rate of 3800 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 with a 6 inch bed.
- d. At least once per 18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 11.0 inches water gauge while operating the filter train at a flow rate of 3800 cfm \pm 10%.
 2. Verifying that the filter train starts and isolation dampers open on each of the following test signals:
 - a) Manual initiation from the control room, and
 - b) Simulated automatic initiation signal.
 3. Verifying that the heaters dissipate at least 24 kW when tested in accordance with ANSI N510-1980.
 4. Verifying that the filter cooling bypass dampers can be remote manually opened and the fan can be remote manually started.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 while operating the system at a flow rate of 3800 cfm \pm 10%.

- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorber bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 3800 cfm \pm 10%.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.7.2.1 The control room emergency filtration system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 95°F.
- b. At least once per 31 days by:
 1. Initiating fan operation from the control room with each subsystem, establishing flow for at least 15 minutes through the HEPA filters and charcoal adsorbers.
 2. Verifying flow through the HEPA filters and charcoal adsorbers for at least 10 hours with the associated emergency makeup inlet air heater OPERABLE. The subsystem used to establish the 10 hours of flow through the HEPA filters and charcoal adsorbers shall be staggered such that each subsystem is utilized at least once per 62 days.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:
 1. Verifying that the system satisfies the in-place penetration testing acceptance criteria of less than 1.0% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the system at a flow rate of 1800 cfm \pm 10% through the makeup filter and 3000 cfm \pm 10% through the recirculation filter.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 with a 2 inch bed for the emergency makeup filter train; and a 4 inch bed for the emergency recirculation air filter train.
 3. Verifying a system flow rate of 3000 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1980.
- d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 with a 2 inch bed for the emergency makeup air filter train; and a 4 inch bed for the emergency recirculation air filter train.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- e. At least once per 18 months by:
1. Verifying that the pressure drop across the recirculation train and across the makeup train combined HEPA filters and charcoal adsorber banks is less than 8 inches and 6 inches water gauge respectively while operating the system at a flow rate of 3000 cfm \pm 10% through the recirculation filter train and 1800 cfm \pm 10% through the makeup filter train.
 2. Verifying that the system will automatically switch to the recirculation mode of operation on each of the below actuation test signals and verifying that on any one of the below recirculation mode actuation test signals, the system automatically switches to the recirculation mode of operation, the isolation valves close within 5 seconds and the control room is maintained at a positive pressure of at least 0.125 inch water gauge relative to the outside atmosphere during system operation at a flow rate less than or equal to 1800 cfm through the emergency makeup air filter:
 - a) Control center inlet radiation monitor.
 - b) Fuel pool ventilation exhaust radiation monitor.
 - c) Low reactor water level.
 - d) High drywell pressure.
 3. Verifying that on the chlorine mode actuation signal, the system automatically switches to the chlorine mode of operation, the isolation valves close within 4 seconds, and a minimum of 1200 cfm emergency recirculation is established.
 4. Verifying that each of the emergency makeup inlet air heaters dissipate 12.0 \pm 2.0 kW when tested in accordance with ANSI N510-1980.
- f. After each complete or partial replacement of a train HEPA filter bank by verifying that the train HEPA filter bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1.0% in accordance with ANSI N510-1980 while operating the system at a flow rate of 1800 cfm \pm 10% for the makeup train and 3000 cfm \pm 10% for the recirculation train.
- g. After each complete or partial replacement of a train charcoal adsorber bank by verifying that the train charcoal adsorber bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1.0% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 1800 cfm \pm 10% for the makeup train and 3000 cfm \pm 10% for the recirculation train.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 110 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated March, 25, 1996, the Detroit Edison Company proposed a revision to the Fermi 2 Technical Specifications (TS) 3/4.6.5.3 "Standby Gas Treatment System (SGTS)" and 3/4.7.2 "Control Room Emergency Filtration System (CREFS)." Specifically, the licensee proposed to change the SGTS Surveillance Requirements (SRs) 4.6.5.3.b.2 and 4.6.5.3.c and the CREFS SRs 4.7.2.1.c.2 and 4.7.2.1.d. In each case, the proposed TS change specifies that the laboratory test of charcoal should use the American Society for Testing and Materials (ASTM) D 3803-1989 test protocol instead of the RDT M 16-1T test protocol referenced in American National Standards Institute (ANSI) N509-1976. In addition, the licensee also proposed to specify the test conditions for temperature and relative humidity (RH) as well as the allowable methyl iodide penetration for the laboratory tests.

2.0 EVALUATION

The proposed TS amendment changes the testing requirements used to determine the operability of the charcoal in the SGTS and CREFS. The charcoal is provided to remove iodine from the air as it passes through the SGTS and CREFS. There are no changes to the physical design or operation of the facility. Table 6.2-11 of the Updated Final Safety Analysis Report (UFSAR) should be revised to reflect that the SGTS charcoal will be lab tested to ensure a 99.9% removal efficiency for methyl iodide. The TS Bases are not affected.

The Fermi 2 SGTS SRs 4.6.5.3.b.2 and 4.6.5.3.c presently specify Regulatory Position C.6.a of Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," as the requirement for the laboratory testing of the charcoal. RG 1.52 references ANSI N509-1976, "Nuclear Power Plant Air Cleaning Units and Components." ANSI N509-1976 specifies that testing is to be performed in accordance with paragraph 4.5.3 of Military Specification RDT M 16-1T, "Gas Phase Adsorbents for Trapping Radioactive Iodine and Iodine Components" (year not specified) at 80 °C and with a 25 °C pre- and post-test sweep. The essential elements of this test are:

- 70% RH for air filtration systems designed to control the RH to 70% (i.e., filtration systems with heaters)

- A 5-hour pre-test charcoal sample equilibration at 25 °C and 70% RH
- A 2-hour injection of challenge gas at a test medium temperature of 80 °C and 70% RH
- A 2-hour post-test sweep at 25 °C and 70% RH
- Methyl iodide penetration of less than 0.175%

The licensee proposed to change Fermi 2 SGTS SRs 4.6.5.3.b.2 and 4.6.5.3.c to reference ASTM D 3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon" as the requirement for the laboratory testing of the charcoal. ASTM D 3803-1989 is updated guidance based on ASTM D 3803-1979 which is updated guidance based on RDT M 16-1T. The essential elements of the proposed TS change for testing per ASTM D 3803-1989 are:

- 70% RH
- A 2-hour pre-test thermal stabilization at 30 °C
- A 16-hour pre-test charcoal sample equilibration at 30 °C and 70% RH
- A 2-hour equilibration of the sample at 30 °C and 70% RH
- A 1-hour injection of challenge gas at a test medium temperature of 30 °C and 70% RH
- A 1-hour post-test sweep at 30 °C and 70% RH
- Methyl iodide penetration less than 0.1%

The major differences between the current TS and the proposed TS change requirements for carbon testing are:

Technical Specifications	Current	Proposed
Test Temperature	25 °C, 80 °C, 25 °C	30 °C
Total Pre-Test Equilibration	5 hours	18 hours
Methyl Iodide Penetration	0.175%	0.1%

In addition, the current TS allow larger tolerances of laboratory test protocol parameters than the proposed TS.

These differences will be addressed individually and will be shown to be acceptable.

As stated above, the licensee proposed to challenge the representative carbon samples at 30 °C rather than 80 °C. Information Notice 86-76, "Problems Noted in Control Room Emergency Ventilation Systems," indicated that laboratory testing of charcoal at a temperature higher than that expected during the course of an accident could result in an overprediction of the capability of the charcoal to remove methyl iodide. The quantity of water retained by charcoal (carbon) is dependent on temperature. Generally, the higher the temperature the less water retained. The water retained by the carbon decreases the efficiency of the carbon to adsorb other contaminants. At 30 °C and 95% RH, carbon will retain about 40 weight percent water. At 80 °C and 95% RH, carbon retains only about 2 to 3 weight percent water. Therefore, the lower temperature test of the proposed TS will yield more conservative results than the present TS.

ASTM D 3803-1989 specifies a test temperature of 30 °C for both the pre- and post-test sweep instead of the 25 °C required by ANSI N509-1976. There is little difference in the adsorption behavior of carbon between these two temperatures. The 25 °C parameter is more conservative. The increase from 25 °C to 30 °C does not represent a significant decrease in the test results. However, the 30 °C test temperature is more representative of the conditions that the charcoal will be exposed to under all potential events, and is, therefore, acceptable.

Pre-test humidity equilibration is achieved by sweeping air of the appropriate humidity through the test carbon. The present TS reference to ANSI N509-1976 (RDT M 16-1T) requires the charcoal to be equilibrated to 25 °C and 70% RH. The methyl iodide test medium would then be instantaneously introduced at 80 °C. Testing the charcoal with such thermal step changes is technically incorrect because it results in condensation forming on the charcoal sample. Condensation on the charcoal sample itself ("wetting the bed") results in the test being invalid. This is supported by paragraph 12.41. of ASTM D 3803-1979 which states with respect to relative humidity of the test medium that, "tests at saturation or above give very erratic results." Because of this, the ASTM D 3803-1989 standard includes a 2-hour pre-test thermal-only stabilization at 30 °C and specifies a temperature of 30 °C for all phases of the test. Therefore, ASTM D 3803-1989 is a better test because it solves the problem of the formation of condensation on the charcoal sample.

The ASTM D 3803-1989 standard is more stringent than the RDT M 16-1T standard since it has smaller tolerances for various parameters of the test protocol that result in more acceptable reproducibility of the test and it requires that the carbon sample be pre-test equilibrated for a much longer duration. The longer pre-equilibration is conservative since it will completely saturate the representative carbon sample to the condition to which the subject charcoal adsorbers are expected to be exposed during design-basis conditions. During the pre-equilibration, the charcoal is exposed to a flow of air controlled at the test temperature and RH before the challenge gas is fed through the charcoal. The purpose of the pre-equilibration phase of the test is to ensure that the charcoal has stabilized at the specified test temperature and RH for a period of time which results in the charcoal adsorbing all the available moisture before the charcoal is challenged with methyl iodide. Therefore, the measured methyl iodide removal efficiency is lower than it is if pre-equilibration is not performed. In addition, the current testing at 80 °C thermally regenerates the charcoal causing the test to provide results which over-predict the capability of the charcoal. Hence, the proposed testing in accordance with ASTM D 3803-1989 standard would result in a more realistic prediction of the capability of the charcoal.

The licensee proposed a methyl iodide penetration of 0.1% for the 6-inch bed of charcoal in the SGTS. Table 2 of RG 1.52 specifies a penetration of 0.175% for beds with a depth of 4 inches or greater. The proposed penetration of 0.1% is acceptable because it is more conservative than the guidance provided in RG 1.52.

The proposed changes to CREFS SRs 4.7.2.1.c.2 and 4.7.2.1.d were similar to the changes proposed for SGTS SRs 4.6.5.3.b.2 and 4.6.5.3.c except a methyl iodide penetration of less than 1.0% was proposed for the 2-inch bed of charcoal for the emergency makeup filter train and the 4-inch bed of charcoal for the emergency recirculation air filter train. The proposed 1.0% methyl iodide penetration is based on the charcoal filter efficiency of 95% credited

in the dose analysis for both the 2-inch and 4-inch beds. If, in the future, higher credit is required for the 4-inch bed of charcoal, then prior NRC approval must be obtained for a TS amendment request to test to a more restrictive methyl iodide penetration. Since the proposed methyl iodide penetration limit is the same as the present penetration limit, the staff finds the proposed changes to CREFS SRs 4.7.2.1.c.2 and 4.7.2.1.d acceptable.

The requested changes revise the charcoal filter laboratory testing in SRs 4.6.5.3.b.2, 4.6.5.3.c, 4.7.2.1.c.2, and 4.7.2.1.d, such that existing test methodology in the TS is revised to reflect current NRC guidance on laboratory testing of charcoal. The staff has evaluated this change and concludes that the testing methodology proposed by the licensee adequately demonstrates the operability of the charcoal in the SGTS and CREFS and is therefore acceptable.

The requested changes to TS 3/4.6.5.3 "Standby Gas Treatment System" and TS 3/4.7.2 "Control Room Emergency Filtration System" revise the SRs for the charcoal filter laboratory testing. The staff has determined that using the proposed ASTM D 3803-1989 testing standard at 30 °C, 70% RH, and a methyl iodide penetration of 0.1% for the SGTS and 1.0% for the CREFS will result in a more realistic prediction of the capability of the charcoal. Therefore, the staff concludes that the testing methodology proposed by the licensee adequately demonstrates the operability of the SGTS and the CREFS and is acceptable.

3.0 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.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment 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 previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (61 FR 40014). 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.

5.0 CONCLUSION

The staff 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.

Principal Contributors: John Segala
Andrew Kugler

Date: December 23, 1996

DATED: December 23, 1996

AMENDMENT NO. 110 TO FACILITY OPERATING LICENSE NO. NPF-43-FERMI-2

Docket File

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