

July 18, 1994

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

Dear Mr. Gipson:

SUBJECT: FERMI-2 - ISSUANCE OF AMENDMENT RE: ADMINISTRATIVE CONTROLS -  
TECHNICAL SPECIFICATIONS (TS) (TAC NO. M86661)

The Commission has issued the enclosed Amendment No. 101 to Facility Operating License No. NPF-43 for the Fermi-2 facility. The amendment consists of changes to the TS in response to your letter, dated May 24, 1993.

The amendment revises Section 6.0 of the TS to incorporate title changes, allows for future title changes without license amendment, changes the description and number of the Onsite Safety Review Organization members, and makes changes to the Plant Manager's delegation of overtime authorization. The change to the position titles of TS 6.2.2.g is not being made, in accordance with your letter of July 7, 1994.

Certain other proposed changes were denied. Specifically, changes in the overtime hours implementation, use of Radiation Protection Technician in lieu of Radiation Protection Supervisor, and changes to the ISEG reporting relationship were not approved. The details concerning our denial of these requested changes are included in the enclosed Safety Evaluation. Several other proposed changes had been approved by previous amendments.

A copy of the Notice of Denial of Amendment for those items not approved and the Notice of Issuance are also enclosed. These notices have been forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by

Timothy G. Colburn, Sr. Project Manager  
Project Directorate III-1  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 101 to NPF-43
- 2. Safety Evaluation
- 3. Notice of Issuance
- 4. Notice of Denial

cc w/enclosures:

See next page

\*See previous concurrence

**NRC FILE CENTER COPY**

OFFICE	*LA:PD31	PM:PD31 <i>the</i>	*BC:RPEB	*OGC	D:PD31 <i>Am</i>
NAME	CJamerson	TColburn:gll	GZech	CPW	TMarsh
DATE	05/24/94	<sup>82</sup> 05/15/94	05/25/94	06/06/94	07/15/94

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DATED: July 18, 1994

AMENDMENT NO. 101 TO FACILITY OPERATING LICENSE NO. NPF-43-FERMI-2

Docket File  
NRC & Local PDRs  
PDIII-1 Reading  
J. Roe  
J. Zwolinski  
L. B. Marsh  
G. Zech, 10/A/19  
C. Jamerson  
T. Colburn  
OGC-WF  
D. Hagan  
G. Hill (2)  
C. Grimes, 11/F/23  
ACRS (10)  
OPA  
OGC  
OC/LFDCB  
M. Phillips, R-III  
SEDB

cc: Plant Service list

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Mr. Douglas R. Gipson  
Detroit Edison Company

Fermi-2

cc:

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Ms. Lynne S. Goodman  
Director - Nuclear Licensing  
Detroit Edison Company  
Fermi-2  
6400 North Dixie Highway  
Newport, Michigan 48166



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. 101  
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 May 24, 1993 and July 7, 1994, 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.

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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. 101, 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



Ledyard B. Marsh, Director  
Project Directorate III-1  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 18, 1994

ATTACHMENT TO LICENSE AMENDMENT NO.101

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

6 - 1  
6 - 2  
6 - 2a  
6 - 7  
6 - 8  
6 - 9  
6 - 10  
6 - 11  
6 - 12  
6 - 13  
6 - 14

INSERT

6 - 1  
6 - 2  
6 - 2a  
6 - 7  
6 - 8  
6 - 9  
6 - 10  
6 - 11\*  
6 - 12  
6 - 13  
6 - 14

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

## 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

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### 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. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physics personnel, auxiliary operators, and key maintenance personnel).

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

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.

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\* 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

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### UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or his designee, 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 should be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- 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.

## ADMINISTRATIVE CONTROLS

### 6.3 UNIT STAFF QUALIFICATIONS

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

### 6.4 TRAINING

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

### 6.5 REVIEW AND AUDIT

#### 6.5.1 ONSITE REVIEW ORGANIZATION (OSRO)

##### FUNCTION

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

##### COMPOSITION

6.5.1.2 The OSRO chairman shall be the Plant Manager and the membership shall be composed of a minimum of 6 but not more than 11 plant management representatives whose responsibilities include the functional areas of: operations, maintenance, radiation protection, engineering/technical support and quality assurance. All members shall be appointed in writing by the OSRO Chairman. The qualifications of each OSRO member shall meet or exceed the requirements and recommendations of Section 4.2 or 4.3 of ANSI N18.1-1971.

##### ALTERNATES

6.5.1.3 The Chairman may designate in writing other members who may serve as the Vice Chairman of the OSRO. Alternates may be designated for specific OSRO members. No more than two alternates shall participate as voting members in OSRO activities at any one time. All alternate members shall be appointed in writing by the OSRO Chairman.

\* 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

### MEETING FREQUENCY

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

### QUORUM

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

### RESPONSIBILITIES

6.5.1.6 The OSRO shall be responsible for:

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

ADMINISTRATIVE CONTROLS  
RESPONSIBILITIES (Continued)

- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Senior Vice President - Nuclear Generation and to the Nuclear Safety Review Group; and
  - m. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and major modifications to the Radwaste Treatment Systems.
  - n. Review of the Fire Protection Program.
- 6.5.1.7 The OSRO shall:
- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
  - b. Render determinations in writing to the Nuclear Safety Review Group with regard to whether or not each item considered under Specification 6.5.1.6a. through f. constitutes an unreviewed safety question.
  - c. Provide written notification within 24 hours to the Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group of disagreement between the OSRO and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

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

6.5.2 NUCLEAR SAFETY REVIEW GROUP (NSRG)  
FUNCTION

- 6.5.2.1 The NSRG shall function to provide independent review and audit of designated activities in the areas of:
- a. Nuclear power plant operations,
  - b. Nuclear engineering,
  - c. Chemistry and radiochemistry,
  - d. Metallurgy,
  - e. Instrumentation and control,
  - f. Radiological controls,
  - g. Mechanical and electrical engineering, and
  - h. Quality assurance practices.

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

## ADMINISTRATIVE CONTROLS

### COMPOSITION

6.5.2.2 The Senior Vice President - Nuclear Generation shall appoint at least nine members to the NSRG and shall designate from this membership a Chairman and at least one Vice Chairman. The membership shall collectively possess experience and competence to provide independent review and audit in the areas listed in Section 6.5.2.1. The Chairman and Vice Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the NSRG review of complex problems. All members shall have at least a bachelor's degree in engineering or related sciences or at least 10 years of responsible power plant experience of which a minimum of 3 years shall be nuclear power plant experience. The Chairman shall have at least 10 years of professional level management experience in the power field and each of the other members shall have at least 5 years of cumulative professional level experience in one or more of the fields listed in Section 6.5.2.1.

### ALTERNATES

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

### CONSULTANTS

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

### MEETING FREQUENCY

6.5.2.5 The NSRG shall meet at least once per 6 months.

### QUORUM

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

### REVIEW

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

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

## ADMINISTRATIVE CONTROLS

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### REVIEW (Continued)

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

### AUDITS

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

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

## ADMINISTRATIVE CONTROLS

### AUDITS (Continued)

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

### RECORDS

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

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

### 6.5.3 TECHNICAL REVIEW AND CONTROL

#### ACTIVITIES

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

ADMINISTRATIVE CONTROLS  
REVIEW

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

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

SAFETY EVALUATIONS

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

QUALIFICATIONS

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

RECORDS

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

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

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

\* 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

### 6.7 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 NSRG shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the OSRO. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRG, and the 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. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 101 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated May 24, 1993, 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 make title changes to various management positions, include a provision to allow future title changes without license amendment, revise the description and number of Onsite Review Organization (OSRO) members, revise the overtime requirements and approval authority, and change the ISEG reporting requirements.

2.0 EVALUATION

The proposed title changes are in conformance with a recent Staffing Transition Program conducted at the Fermi 2 site and are generally acceptable. The effort was designed to streamline reporting relationships and improve overall operational efficiency. In many cases, the change was in title only. For example, the functions of the Senior Vice President, which was for a short period called Executive Vice President, and the Assistant Vice President - Nuclear Production have been consolidated under the position of "Senior Vice President - Nuclear Generation." The licensee also asked by letter dated July 7, 1994, that the change to TS 6.2.2.g be withdrawn. Except as noted below, the requested title changes are acceptable.

Certain of the licensee's proposed staffing title changes were not viewed as being changes in title only and are denied. These include the proposed change to TS 6.2.3.4 for the Independent Safety Engineering Group (ISEG) reporting requirements. This would change the reporting requirement for recommendations for revised procedures, modifications, maintenance and operations from the "Vice President - Nuclear Engineering and Services" to "Nuclear Generation Management." The proposed change would not achieve the same level of management oversight as is currently required, i.e., vice president. While the supporting justification of making ISEG recommendations to the responsible management for the area being reviewed has merit, this can be achieved by improved interdepartmental communications without sacrificing senior management oversight of the ISEG recommendations and related followup activities.

Also denied is the proposed change to TS 6.2.2.f which defines those unit staff members to which administrative procedures governing overtime limits are applicable. The proposed changes would delete the radiation protection

technicians (formerly health physicists) from those listed as examples of staff members who work on safety-related equipment. The proposed amendment is denied because the NRC considers this occupation to be within the scope of those considered as working on safety-related equipment.

The proposed change to TS 6.12.1.c would change the governing authority on a Radiation Work Permit for specifying the frequency of surveillances from a Radiation Protection Supervisor to a Radiation Protection Technician. The staff has determined that this authority should remain at the supervisory level and this proposal is denied. While future specific title changes would be allowed for this position as a result of another proposed TS change, the level of authority for meeting the specified requirements should remain at the supervisory level.

The licensee also proposed adding a footnote for certain titles to preclude the need for future TS changes for title changes only. The "alternative title" designated for a position would have all requirements of the TS apply to the alternative title as apply to the specified title. Alternative titles would be specified in the Updated Final Safety Analysis Report (UFSAR). The staff finds that the requested change is acceptable so long as the unit staff qualification requirements of TS 6.3 and any related standards or qualifications specified in the UFSAR related to a specified title are also met with respect to the alternate title.

The licensee requested changes to TS 6.5.1 for the designation and composition of the onsite review organization (OSRO). The changes include designation by management functional area rather than title and the provision allowing the OSRO chairman to designate other members who may serve as vice-chairman of OSRO. The staff has reviewed these changes and finds them acceptable. The staff notes that the previous footnote for the listed members and vice-chairman clarifying that a vice-chairman could not serve as both chairman and voting member at the same time has been removed. The staff has verified that this stipulation is contained, by procedure, in the written designation and also is reinforced by TS 6.5.1.5 which identifies the quorum requirements. Therefore, this change is also acceptable.

The licensee also requested changes to TS 6.2.2.f for overtime controls. The proposed change to TS 6.2.2.f.3 would allow a break of at least 8 hours before returning to work only if an individual works 16 hours or more continuously (including shift turnover). This is a significant change to the current requirement that a break of at least 8 hours be allowed between work periods, including shift turnover. The staff reviewed this proposed change and the licensee's supporting justification. The staff does not agree that the proposed TS adequately clarifies the intent of the requirements. If the proposed TS were approved, there would be no need for TS 6.2.2.f.3 because the previous two TS requirements would make it impossible to meet the first two and violate the third. The purpose for the current TS 6.2.2.f.3 is to ensure adequate rest between work periods regardless of duration. The staff has determined that the licensee has not provided adequate justification for this proposed change and this proposed change is denied. The proposed change to TS 6.2.2.f.4 no longer specifies the Plant Manager's monthly review of overtime as "individual overtime." The licensee's supporting justification is that it believes "management oversight of overtime can be more effectively done by reviewing

information which has been previously aggregated and evaluated." Nothing in the current TS requirements prevents the licensee from doing this. However, the requirement to review individual overtime is based on observing whether individual patterns are occurring which might lead to violations. The staff finds that the requested change is not sufficiently justified. The staff, therefore, denies the proposed TS change.

The licensee's proposed change to TS 6.2.2.f has been discussed previously for its proposal to eliminate the radiation protection technicians (formerly health physicists) from the list of those for whom the overtime limits should apply. The proposed change from applicability "to those who perform safety-related functions" to "those who work on safety-related equipment" is denied. The staff believes that limiting the overtime controls to those who work directly on safety-related equipment rather than those who also perform safety-related functions could adversely impact safety. Therefore, this related change is denied.

The staff has reviewed the licensee's proposed change for approval of deviations from the overtime controls from (in addition to the Plant Manager) the "Section Superintendent" to the Plant Manager's designee. The staff finds that this added flexibility continues to provide adequate oversight, and is therefore, acceptable.

The staff notes that the margin bars for TS 6.5.1.4, 6.5.1.5, 6.13.2, and the footnote at the bottom of page 6-23 did not indicate changes from the current TS. Therefore, no changes were made.

### 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

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.

### 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 Contributor: T. Colburn  
Date: July 18, 1994

UNITED STATES NUCLEAR REGULATORY COMMISSIONDETROIT EDISON COMPANYDOCKET NO. 50-341NOTICE OF ISSUANCE OF AMENDMENT TOFACILITY OPERATING LICENSE

The U.S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 101 to Facility Operating License No. NPF-43 issued to Detroit Edison Company (the licensee), which revised the Technical Specifications for operation of the Fermi 2 facility located in Monroe County, Michigan. The amendment is effective as of the date of issuance with full implementation within 45 days.

The amendment modified the Technical Specifications to make changes to job titles including a provision for future title changes, made changes to the onsite review organization (OSRO) membership and certain changes to the overtime controls.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment.

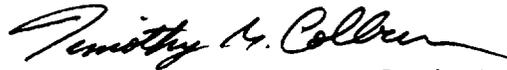
Notice of Consideration of Issuance of Amendment and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on September 2, 1993 (58 FR 46664). No request for a hearing or petition for leave to intervene was filed following this notice. A requested title change to TS 6.2.2.g was withdrawn by the licensee's letter dated July 7, 1994 as it

was no longer needed.

For further details with respect to the action see (1) the application for amendment dated May 24, 1993 and supplemented by letter dated July 7, 1994, (2) Amendment No. 101 to License No. NPF-43, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street NW., Washington, DC 20555, and at the local public document room located at the Monroe County Library System, 3700 South Custer Road, Monroe, Michigan 48161.

Dated at Rockville, Maryland, this 18th day of July 1994

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy G. Colburn, Sr. Project Manager  
Project Directorate III-I  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

UNITED STATES NUCLEAR REGULATORY COMMISSIONDETROIT EDISON COMPANYDOCKET NO. 50-341NOTICE OF DENIAL OF AMENDMENT TO FACILITY OPERATING LICENSE  
AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) has partially denied a request by Detroit Edison Company, (licensee) for an amendment to Facility Operating License No. NPF-43 issued to the licensee for operation of the Fermi 2 facility, located in Monroe County, Michigan. Notice of Consideration of Issuance of this amendment was published in the FEDERAL REGISTER on September 2, 1993 (58 FR 46664).

The purpose of the licensee's amendment request was to make changes to job titles, including a provision to allow for future job title changes, changes to the onsite review organization (OSRO), and changes to the overtime limit restrictions and control requirements of Section 6.0 of the Technical Specifications (TS).

The Commission has concluded that the licensee's request cannot be fully granted. Certain requested title changes and changes to the overtime limits, and a proposed change to the authority to specify the number of surveillances under a radiation work permit, are denied. The licensee was notified of the Commission's denial of the proposed change by a letter dated .

By August 24, 1994, the licensee may demand a hearing with respect to the denial described above. Any person whose interest may be affected by this proceeding may file a written petition for leave to intervene.

A request for hearing or petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission,

Washington, DC 20555, Attention: Docketing and Services Branch, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC 20555 by the above date.

A copy of any petitions should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to John Flynn, Esq., Detroit Edison Company, 2000 Second Avenue, Detroit, Michigan 48226, attorney for the licensee.

For further details with respect to this action, see (1) the application for amendment dated May 24, 1993, and (2) the Commission's letter to the licensee dated July 18, 1994 .

These documents are available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC 20555, and at the Monroe County Public Library System, 3700 South Custer Road, Monroe, Michigan 48161. A copy of item (2) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Document Control Desk.

Dated at Rockville, Maryland, this 18 day of July 1994.

FOR THE NUCLEAR REGULATORY COMMISSION



Ledyard B. Marsh, Project Director  
Project Directorate III-I  
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