

June 29, 1994

Docket No. 50-341

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: RELOCATION OF RESPONSE TIME
LIMIT TABLES IN ACCORDANCE WITH GENERIC LETTER 93-08 (TAC NO.
M89397)

The Commission has issued the enclosed Amendment No. 100 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 April 26, 1994.

The amendment revises the TS to remove reference to instrument response time tables for the reactor protection system (RPS), isolation actuation system (IAS), and emergency core cooling system (ECCS) from the Limiting Conditions for Operation and Surveillance Requirements and relocates the RPS, IAS, and ECCS response time limit tables to the Updated Final Safety Analysis Report.

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

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. 100 to NPF-43
2. Safety Evaluation

cc w/enclosures:
See next page

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Detroit Edison Company

Fermi-2

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DATED: June 29, 1994

AMENDMENT NO. 100 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. 100
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 April 26, 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. 100 , 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 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION


Jedyard 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: June 29, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 100

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

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3/4 3-6
3/4 3-9
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3/4 3-23
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INSERT

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3/4 3-1a
3/4 3-5*
3/4 3-6
3/4 3-9
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*Overleaf page provided to maintain document completeness. No changes contained on these pages.

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3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3.1-1.

ACTION:

- a. With the number of OPERABLE channels less than required by the Minimum OPERABLE channels per Trip System requirement for one trip system:
 1. Within 1 hour, verify that each Functional Unit within the affected trip system contains no more than one inoperable channel or place the inoperable channel(s) and/or that trip system in the tripped condition*.
 2. If placing the inoperable channel(s) in the tripped condition would cause a scram, the inoperable channel(s) shall be restored to OPERABLE status within 6 hours or the ACTION required by Table 3.3.1-1 for the affected Functional Unit shall be taken.
 3. If placing the inoperable channel(s) in the tripped condition would not cause a scram, place the inoperable channel(s) and/or that trip system in the tripped condition within 12 hours.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system** in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1.

*An inoperable channel need not be placed in the tripped condition where this would cause a scram to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within 2 hours after the channel was first determined to be inoperable or the ACTION required by Table 3.3.1-1 for that Functional Unit shall be taken.

**The trip system need not be placed in the tripped condition if this would cause a scram to occur. When a trip system can be placed in the tripped condition without causing a scram to occur, place the trip system with the most inoperable channels in the tripped condition; if both systems have the same number of inoperable channels, place either trip system in the tripped condition.

3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.

4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.1.3 The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months. Neutron detectors are exempt from response time testing. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip system.

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

TABLE NOTATIONS

- (a) A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition provided at least one OPERABLE channel in the same trip system is monitoring that parameter.
- (b) This function shall be automatically bypassed when the reactor mode switch is in the Run position.
- (c) Unless adequate shutdown margin has been demonstrated per Specification 3.1.1, the "shorting links" shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn.*
- (d) When the "shorting links" are removed, the Minimum OPERABLE Channels Per Trip System is 4 APRMs, 6 IRMs and per Specification 3.9.2, 2 SRMs.
- (e) An APRM channel is inoperable if there are less than 2 LPRM inputs per level or less than 14 LPRM inputs to an APRM channel.
- (f) This function is not required to be OPERABLE when the reactor pressure vessel head is removed per Specification 3.10.1.
- (g) This function shall be automatically bypassed when the reactor mode switch is not in the Run position.
- (h) This function is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required.
- (i) With any control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.
- (j) This function shall be automatically bypassed when turbine first stage pressure is \leq 161.9 psig, equivalent to THERMAL POWER less than 30% of RATED THERMAL POWER.

*Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.

Table 3.3.1-2 has been deleted.

INSTRUMENTATION

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2 The isolation actuation instrumentation channels shown in Table 3.3.2-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2.

APPLICABILITY: As shown in Table 3.3.2-1.

ACTION:

- a. With an isolation actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system:
 1. If placing the inoperable channel(s) in the tripped condition would cause an isolation, the inoperable channel(s) shall be restored to OPERABLE status within 6 hours or the ACTION required by Table 3.3.2-1 for the affected trip function shall be taken.
 2. If placing the inoperable channel(s) in the tripped condition would not cause an isolation, the inoperable channel(s) and/or that trip system shall be placed in the tripped condition within:
 - a) 12 hours for trip functions common to RPS Instrumentation;
and
 - b) 24 hours for trip functions not common to RPS Instrumentation.
- c. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system* in the tripped condition within one hour and take the ACTION required by Table 3.3.2-1.

*Place one trip system (with the most inoperable channels) in the tripped condition. The trip system need not be placed in the tripped condition when this would cause the isolation to occur.

INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.3.2.1 Each isolation actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.2.1-1.

4.3.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.2.3 The ISOLATION SYSTEM RESPONSE TIME of each isolation trip function shall be demonstrated to be within its limit at least once per 18 months. Radiation detectors are exempt from response time testing. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific isolation trip system.

Table 3.3.2-3 has been deleted.

Next page is 3/4 3-20

INSTRUMENTATION

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2.

APPLICABILITY: As shown in Table 3.3.3-1.

ACTION:

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.
- c. With either ADS trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status within:
 1. 7 days, provided that the HPCI and RCIC systems are OPERABLE, otherwise,
 2. 72 hours.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 150 psig within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

TABLE 3.3.3-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM(a)</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
<u>1. CORE SPRAY SYSTEM</u>			
a. Reactor Vessel Low Water Level - Level 1	2(b)	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2(b)	1, 2, 3	30
c. Reactor Steam Dome Pressure - Low (Injection Permissive)	2	1, 2, 3	30
d. Manual Initiation	2	4*, 5*	30
	1##	1, 2, 3, 4*, 5*	33
<u>2. LOW PRESSURE COOLANT INJECTION MODE OF RHR SYSTEM</u>			
a. Reactor Vessel Low Water Level - Level 1	2	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2	1, 2, 3	30
c. Reactor Steam Dome Pressure - Low (Valve Permissive)	2	1, 2, 3	30
d. Reactor Vessel Low Water Level - Level 2 (Loop Select Logic)	2	4*, 5*	30
e. Reactor Steam Dome Pressure - Low (Break Detection Logic)	2	1, 2, 3, 4*, 5*	30
f. Riser Differential Pressure - High (Break Detection)	2	1, 2, 3, 4*, 5*	30
g. Recirculation Pump Differential Pressure - High (Break Detection)	2	1, 2, 3	30
h. Manual Initiation	2	1, 2, 3	30
	1##	1, 2, 3, 4*, 5*	33
<u>3. HIGH PRESSURE COOLANT INJECTION SYSTEM#</u>			
a. Reactor Vessel Low Water Level - Level 2	2	1, 2, 3	30
b. Drywell Pressure - High	2	1, 2, 3	30
c. Condensate Storage Tank Level - Low	2(c)	1, 2, 3	34
d. Suppression Pool Water Level - High	2(d)	1, 2, 3	34
e. Reactor Vessel High Water Level - Level 8	2(e)	1, 2, 3	32
f. Manual Initiation	1##	1, 2, 3	33

Table 3.3.3-3 has been deleted.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 100 TO FACILITY OPERATING LICENSE NO. NPF-43

RELOCATION OF INSTRUMENT RESPONSE TIME LIMIT TABLES

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated April 26, 1994, Detroit Edison Company (the licensee), submitted a request for changes to the Fermi 2 nuclear plant Technical Specifications (TS). The requested amendment would change the TS to modify the requirements of TS 3.3.1, 4.3.1.3, 3.3.2, 4.3.2.3, 3.3.3, and 4.3.3.3 and relocate Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 which provide the response time limits for the reactor protection system (RPS), the isolation actuation system (IAS) instruments, and the emergency core cooling system (ECCS) from the TS to the Updated Final Safety Analysis Report (UFSAR). The licensee has stated that the next update of the UFSAR will include these tables. The NRC provided guidance to all holders of operating licenses or construction permits for nuclear power reactors on the proposed TS changes in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

2.0 BACKGROUND

The NRC staff undertook efforts in the early 1980's to address problems related to the content of nuclear power plant TS. These projects have resulted in the issuance of various reports, proposed rulemakings, and Commission policy statements. Line item improvements became a mechanism for TS improvement as part of the implementation of the Commission's interim policy statement on TS improvements published on February 6, 1987 (52 FR 3788). The final Commission policy statement on TS improvements was published July 22, 1993 (58 FR 39132). The final policy statement provided criteria which can be used to establish, more clearly, the framework for TS. The staff has maintained the line item improvement process, through the issuance of generic letters, in order to improve the content and consistency of TS and to reduce the licensee and staff resources required to process amendments related to those specifications being relocated from the TS to other licensee documents as a result of the implementation of the Commission's final policy statement.

Section 50.36 of Title 10 of the Code of Federal Regulations establishes the regulatory requirements for licensees to include TS as part of applications for operating licenses. The rule requires that TS include items in five specified categories: (1) safety limits, limiting safety system settings, and

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limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. In addition, the Commission's final policy statement on TS improvements and other Commission documents provide guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the Commission's final policy statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval.

The Commission's final policy statement recognized, as had previous statements related to the staff's TS improvement program, that implementation of the policy would result in the relocation of existing TS requirements to licensee-controlled documents such as the UFSAR. Those items relocated to the UFSAR would in turn be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests and experiments." Section 50.59 of Title 10 of the Code of Federal Regulations provides criteria to determine when facility or operating changes planned by a licensee require prior Commission approval in the form of a license amendment in order to address any unreviewed safety questions. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to UFSAR commitments and to take any remedial action that may be appropriate.

3.0 EVALUATION

The licensee has proposed changes to TS 3.3.1, 4.3.1.3, 3.3.2, 4.3.2.3, 3.3.3, and 4.3.3.3 and that remove the references to Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 and deletes these tables from the TS. The licensee committed to relocate the tables on response time limits to the UFSAR in the next periodic update.

Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 contain the values of the response time limits for the RPS, IAS, and ECCS instruments. The limiting conditions for operation for the RPS, IAS, and ECCS instrumentation specify these systems shall be operable with the response times as specified in these tables. These limits are the acceptance criteria for the response time tests performed to satisfy the surveillance requirements of TS 4.3.1.3, TS 4.3.2.3, and TS 4.3.3.3 for each applicable RPS, IAS, and ECCS trip function. These surveillances ensure that the response times of the RPS, IAS and ECCS instruments are consistent with the assumptions of the safety analyses performed for design basis accidents and transients. The changes associated with the implementation of Generic Letter 93-08 involve only the relocation of the RPS, IAS, and ECCS response time tables but retain the surveillance requirement to perform response time testing. The UFSAR will now contain the acceptance criteria for the required RPS, IAS, and ECCS response time surveillances. Because it does not alter the TS requirements to ensure that the response times of the RPS, IAS, and ECCS instruments are within their limits, the staff has concluded that relocation of these response time limit tables from the TS to UFSAR is acceptable.

The staff's determination is based on the fact that the removal of the specific response time tables does not eliminate the requirements for the licensee to ensure that the protection instrumentation is capable of performing its safety function. Although the tables containing the specific response time requirements are relocated from the TS to the UFSAR, the licensee must continue to evaluate any changes to response time requirements in accordance with 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question exists, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change.

The staff's review concluded that 10 CFR 50.36 does not require the response time tables to be retained in TS. Requirements related to the operability, applicability, and surveillance requirements, including performance of testing to ensure response times, for RPS, IAS, and ECCS systems are retained due to those systems' importance in mitigating the consequences of an accident. However, the staff determined that the inclusion of specific response time requirements for the various instrumentation channels and components addressed by Generic Letter 93-08 was not required. The response times are considered to be an operational detail related to the licensee's safety analyses which are adequately controlled by the requirements of 10 CFR 50.59. Therefore, the continued processing of license amendments related to revisions of the affected instrument or component response times, where the revisions to those requirements do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety. Further, the response time requirements do not constitute a condition or limitation on operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, in that the ability of the RPS, IAS, and ECCS systems to perform their safety functions are not adversely impacted by the relocation of the response time tables from the TS to the UFSAR.

These TS changes are consistent with the guidance provided in Generic Letter 93-08 and the TS requirement of 10 CFR 50.36. The staff has determined that the proposed changes to the TS for the Fermi 2 nuclear plant are acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC 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 (59 FR 27053). 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.

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.

Principal Contributors: Timothy G. Colburn
William Reckley

Date: June 29, 1994