

Docket No. 50-341

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

February 8, 1994

Dear Mr. Gipson:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT
IMPACT - EXEMPTION FROM REQUIREMENT OF 10 CFR PART 50,
APPENDIX J, III.A.6(b) (FOR ACCELERATED TYPE A CONTAINMENT
INTEGRATED LEAK RATE TEST FREQUENCY) - FERMI 2 (TAC NO. M86657)

Enclosed is a copy of the Environmental Assessment and Finding of No
Significant Impact concerning your request, dated May 24, 1993, for exemption
from the requirement in Appendix J, III.A.6(b) of 10 CFR Part 50. The
assessment has 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/V
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
See next page

OFFICE	LA:PD31	PM:PD31 <i>See</i>	(A)PD:PD31 <i>↩</i>	OGC <i>FO</i>
NAME	CJamerson	TColburn	RBlough	<i>A. Jorgensen</i>
DATE	01/24/94	01/24/94	01/21/94	01/31/94

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C. Jamerson	
T. Colburn	

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cc: Plant Service list

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PDR ADOCK 05000341
P PDR

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REG FILE CENTER COPY *cp-1*

Mr. Douglas R. Gipson
Detroit Edison Company

Fermi-2

cc:

John Flynn, Esquire
Senior Attorney
Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3423 N. Logan Street
P. O. Box 30195
Lansing, Michigan 48909

Mr. Wayne Kropp
U.S. Nuclear Regulatory Commission
Resident Inspector Office
6450 W. Dixie Highway
Newport, Michigan 48166

Monroe County Office of Civil
Preparedness
963 South Raisinville
Monroe, Michigan 48161

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Mr. William E. Miller
Director - Nuclear Licensing
Detroit Edison Company
Fermi-2
6400 North Dixie Highway
Newport, Michigan 48166

UNITED STATES NUCLEAR REGULATORY COMMISSIONDETROIT EDISON COMPANYFERMI 2DOCKET NO. 50-341ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the requirement of 10 CFR Part 50, Appendix J, Paragraph III.A.6(b) to Detroit Edison Company (the licensee), for operation of the Fermi 2 Plant, located in Monroe County, Michigan.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action

The proposed action would grant an exemption from the accelerated Type A integrated leak rate test frequency requirement of Appendix J, Paragraph III.A.6(b) of 10 CFR Part 50. On May 24, 1993, the licensee requested an exemption from paragraph III.A.6(b) which requires that if two consecutive Type A tests fail to meet the acceptance criteria, a Type A test shall be performed at each plant shutdown for refueling or approximately every 18 months, whichever occurs first, until two consecutive Type A tests meet the acceptance criteria. The licensee identified the cause of the Type A failures as Type C local leakage which has subsequently been corrected. The licensee referenced NRC Information Notice (IN) 85-71, "Containment Integrated Leak Rate Tests," for guidance concerning the requested exemption. IN 85-71 states that "if Type B and C leakage rates constitute an identified contributor to this failure of the as-found condition for the CILRT [Type A containment

integrated leak rate test], the general purpose of maintaining a high degree of containment integrity might be better served through an improved maintenance and testing program for containment penetration boundaries and isolation valves. In this situation, the licensee may submit a Corrective Action Plan with an alternative leakage test program proposal as an exemption request for NRC staff review." If this submittal is approved, the licensee is allowed to implement the corrective actions in lieu of the required increase in Type A test frequency.

The Need for the Proposed Action

The proposed exemption is needed because compliance to paragraph III.A.6(b) of 10 CFR Part 50, Appendix J, would result in increased costs, extended outage time and additional personnel radiation exposure in order to comply with the increased Type A test frequency. The establishment of a Corrective Action Plan meets the underlying purpose of the regulations for maintaining overall containment integrity. This action is similar to that approved for several other facilities.

Environmental Impact of the Proposed Action

The proposed exemption would allow the substitution of a Corrective Action Plan in lieu of an increased test frequency for containment Type A leakage tests. The purpose of Type A testing is to ensure that the leakage through the primary reactor containment would not exceed the maximum allowable leakage during a design basis accident. It also provides assurance that the Local Leak Rate Test (LLRT) Program adequately identifies and corrects containment penetrations requiring repair. The licensee has implemented a Corrective Action Plan to correct LLRT deficiencies which have been attributed as the cause for previous Type A failures which have led to the increased testing

frequency. The approved Corrective Action Plan will provide equivalent assurance of containment integrity, and will not alter the method of operation of the facility. The only change will be, on a one-time basis, the frequency for conducting the Type A CILRT. Therefore, post-accident radiological releases will not exceed previously determined values as a result of the proposed action. Further, the exemption is not expected to have an impact on plant radiological effluent releases. The proposed action does have the potential to reduce occupational exposure by reducing the amount of time personnel are required to spend in a radiologically restricted area.

With regard to potential non-radiological impacts, the proposed action and related change to the Technical Specifications involve a change in the surveillance requirements and will not affect non-radiological plant effluents nor does it have any other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed amendment.

Alternative to the Proposed Action

Since the Commission concluded that there are no significant environmental effects that would result from the proposed action, any alternatives with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested exemption and amendment. This would not reduce environmental impacts of plant operation and would result in reduced operational flexibility and greater occupational exposure to plant personnel.

Alternative Use of Resources

This action does not involve the use of resources not previously considered in connection with the Commission's Final Environmental Statement, dated

August 1981, for Fermi 2.

Agencies and Persons Consulted

The staff consulted with the State of Michigan regarding the environmental impact of the proposed action. The State had no comments.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, the staff concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this proposed action, see the licensee's application and request for exemption dated May 24, 1993. This document is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., 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 8th day of February 1994.

FOR THE NUCLEAR REGULATORY COMMISSION



A. Randolph Blough, Acting Director
Project Directorate III-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation