

William T. O'Connor, Jr.  
Vice President, Nuclear Generation

Fermi 2  
6400 North Dixie Hwy., Newport, Michigan 48166  
Tel: 734.586.5201 Fax: 734.586.4172

**Detroit Edison**



A DTE Energy Company

10CFR50.90

March 26, 2002  
NRC-02-0023

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington D C 20555-0001

- References: 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
- 2) Detroit Edison letter to NRC, "Proposed Technical Specification Change (License Amendment) – Deletion of Required Action for the Restoration of Oscillation Power Range Monitor Function, Reactor Protection System (RPS) Instrumentation TS 3.3.1.1", dated August 24, 2001

Subject: Response to Request for Additional Information on  
Technical Specification Change Request Related to  
Oscillation Power Range Monitor Function  
(TAC No. MB 2786)

On March 5, 2002, a teleconference between the Detroit Edison and NRC staffs was conducted to discuss two questions from the NRC pertaining to a Technical Specification Change Request related to the Oscillation Power Range Monitor (OPRM) function (Reference 2). Detroit Edison provides the attached response as discussed in the teleconference.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

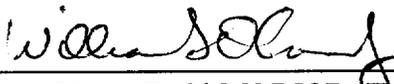
Sincerely,

Attachment

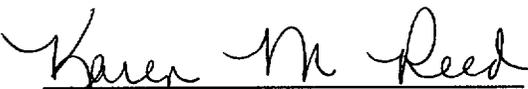
cc: T. J. Kim  
M. A. Ring  
NRC Resident Office  
Regional Administrator, Region III  
Supervisor, Electric Operators,  
Michigan Public Service Commission

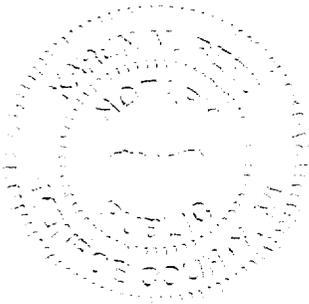
1001

I, WILLIAM T. O'CONNOR, JR., do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

  
\_\_\_\_\_  
WILLIAM T. O'CONNOR, JR.  
Vice President - Nuclear Generation

On this 26<sup>th</sup> day of March, 2002 before me personally appeared William T. O'Connor, Jr., being first duly sworn and says that he executed the foregoing as his free act and deed.

  
\_\_\_\_\_  
Notary Public



KAREN M. REED  
Notary Public, Monroe County, MI  
My Commission Expires 09/02/2005

**Question 1:**

Describe the operating experience after the Long-term Stability Option III Oscillation Power Range Monitor (OPRM) system was armed and also identify any difficulty for the system if any prior to declare inoperable.

**Response to Question 1:**

The Oscillation Power Range Monitor (OPRM) was armed and declared operable in May 2000, during the startup following the Seventh Refueling Outage. The system did not experience any difficulty until the system was declared inoperable on June 27, 2001 due to a potential 10CFR21 condition. It should be noted, however, that even after it was declared inoperable the system remained in service and would have performed its intended function if required.

**Question 2:**

It appears that all the GE provided Option III OPRM systems have performed well except Part 21 issue on the generic DIVOM curve. Please provide the position for Fermi plant in relation to obtaining an interim plant specific DIVOM curve from GE similar to the position taken by Hatch plants. Please identify where the document relating to alternate interim corrective action function is maintained.

**Response to Question 2:**

In accordance with the recommendations provided to Detroit Edison by GE which were subsequently issued formally in GE's final Part 21 Notification (SC01-02), Detroit Edison developed a conservative Figure of Merit value for Fermi 2 Cycle 8, which was calculated in accordance with the BWROG guidance. Based on the Figure of Merit value provided to GE by Detroit Edison, GE provided an interim DIVOM curve slope that was more conservative than the generic DIVOM curve for regional mode oscillations contained in NEDO-32465A. Based upon this interim DIVOM curve slope, Detroit Edison calculated an interim OPRM trip setpoint for the remainder of Cycle 8 (which ended on October 27, 2001), and the OPRM system was declared OPERABLE on August 17, 2001. Due to the conservatism that already existed in the Fermi 2 Cycle 8 OPRM trip setpoint prior to the issuance of the Part 21 Notification, the interim OPRM trip setpoint was calculated to be the same as that already implemented in the OPRM system, so no physical setpoint change was necessary in order to declare the OPRM system OPERABLE.

For the current operating cycle (Cycle 9), a conservative Figure of Merit value was again calculated by Detroit Edison, based on the BWROG guidance. GE subsequently determined an appropriate interim DIVOM curve slope to use in the standard reload licensing calculation of the

OPRM trip setpoint for Cycle 9. The resulting Cycle 9 OPRM interim trip setpoint was determined to be the same as that used in Cycle 8, thus maintaining the OPRM system OPERABLE in Cycle 9.

Fermi 2 Technical Requirements Manual, TR 3.4.1.1, "Recirculation Loops Operating-Regions", specifies the alternate method to detect and suppress thermal hydraulic instability oscillations initiated by Technical Specification 3.3.1.1 REQUIRED ACTION J.1 when the OPRM is inoperable.