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Detroit Edison



A DTE Energy Company

10CFR50.90

May 23, 2002
NRC-02-0025

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

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Application for Technical Specification Improvement to Eliminate
Requirements for Post Accident Sampling Systems Using the
Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90 Detroit Edison is submitting a request for an amendment to the Technical Specifications (TS) for Fermi 2.

The proposed amendment would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling System (PASS)," and thereby eliminate the requirements to have and maintain the PASS at Fermi 2. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the *Federal Register* on March 20, 2002, as part of the consolidated line item improvement process (CLIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides

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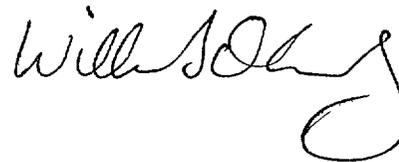
the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

Detroit Edison requests approval of the proposed License Amendment by September 15, 2002, with the amendment being implemented within 90 days following approval.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Michigan Official.

If you should have any questions regarding this submittal, please contact Norman K. Peterson at (734) 586-4258.

Sincerely,



Attachments:

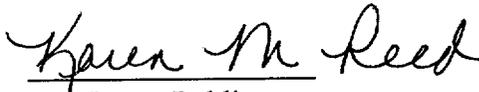
1. Description and Assessment
2. Proposed Technical Specification Changes (mark-ups)
3. Revised Technical Specification Pages
4. Regulatory Commitments

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

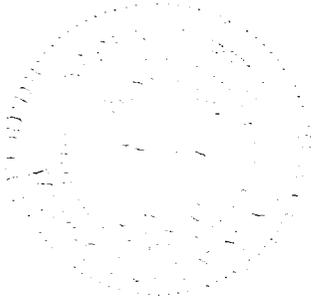
I, WILLIAM T. O'CONNOR, JR., do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


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

On this 23rd day of May, 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



ATTACHMENT 1

DESCRIPTION and ASSESSMENT

1.0 DESCRIPTION:

The proposed license amendment deletes the program requirements of Technical Specification 5.5.3, "Post Accident Sampling System (PASS)."

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413. The availability of this Technical Specification improvement was announced in the Federal Register on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT:

2.1 Applicability of Published Safety Evaluation

Detroit Edison has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability), as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS), submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). Detroit Edison has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Fermi 2 and justify this amendment for the incorporation of the changes to the Fermi 2 Technical Specifications.

2.2 Optional Changes and Variations

Detroit Edison is not proposing any variations or deviations from the Technical Specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001. The Fermi 2 TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS 5.5.2 as falling under the scope of this requirement. As described in the staff's model safety

evaluation published on December 27, 2001, Detroit Edison is proposing to maintain the PASS fully functional, and therefore, it will continue to be a potential leakage path outside containment for highly radioactive fluids (e.g., the PASS piping will penetrate the containment with valves or other components in the system from which highly radioactive fluid could leak). Therefore, no changes to Technical Specification 5.5.2 are being requested.

3.0 REGULATORY ANALYSIS:

3.1 No Significant Hazards Determination

Detroit Edison has reviewed the proposed no significant hazards consideration determination published on December 27, 2001 (66 FR 66949) as part of the CLIIP. Detroit Edison has concluded that the proposed determination presented in the notice is applicable to Fermi 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on December 27, 2001 for this Technical Specification improvement, plant-specific verifications were performed as follows:

- 1 Detroit Edison has developed contingency plans for obtaining and analyzing highly radioactive samples from the reactor coolant system (RCS), the suppression pool, and the containment atmosphere. The contingency plans are contained in the plant technical procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established for Fermi 2 at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability is described in the emergency plan implementing procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.
3. Detroit Edison has developed an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines is maintained within the emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION:

Detroit Edison has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. Detroit Edison has concluded that the staff's findings presented in that evaluation are applicable to Fermi 2 and the evaluation is hereby incorporated by reference for this application.

Attachment 2 to
NRC-02-0025

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UPS)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made.

Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, reactor water sampling, Post Accident Sampling, reactor water cleanup, Hydrogen Recombiners, Primary Containment Monitoring, control rod drive discharge headers, and Standby Gas Treatment. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3

Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;

Not Used →

(continued)

5.5 Programs and Manuals

5.5.3

Post Accident Sampling (continued)

- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

5.5.4

Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20.1001 - 20.2402, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

(continued)

Attachment 3 to
NRC-02-0025

ATTACHMENT 3
REVISED TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made.

Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, reactor water sampling, Post Accident Sampling, reactor water cleanup, Hydrogen Recombiners, Primary Containment Monitoring, control rod drive discharge headers, and Standby Gas Treatment. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Not Used

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20.1001 - 20.2402, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

(continued)

ATTACHMENT 4

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Detroit Edison in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Norm Peterson (734) 586-4258.

<u>Regulatory Commitments</u>	<u>Due Date/Event</u>
Detroit Edison has developed contingency plans for obtaining and analyzing highly radioactive samples from the reactor coolant system (RCS), the suppression pool, and the containment atmosphere. The contingency plans are contained in the plant technical procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.	Complete
The capability for classifying fuel damage events at the Alert level threshold has been established for Fermi 2 at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability is described in the emergency plan implementing procedures, and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete
Detroit Edison has developed an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines is maintained within the emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete