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Detroit Edison

A DTE Energy Company

10CFR50.90

July 16, 2002
NRC-02-0055

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)-Response Time Testing, NRC-02-0036, dated May 30, 2002

Subject: Response to the Request for Additional Information Concerning Technical Specification Change Request Related to Response Time Testing (TAC No. MB5173)

On June 17, 2002, a teleconference between Detroit Edison and the NRC was conducted to discuss questions the NRC had pertaining to a Technical Specification change request to eliminate specific response time testing requirements (Reference 2). Detroit Edison's response to these questions is attached.

No commitments are being made in this letter.

A001

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

Sincerely,

William D. O'Connor

Attachment

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 16th day of July, 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

bcc: G. D. Cerullo
D. K. Cobb
R. W. Libra
S. R. Peterman
N. K. Peterson
L. D. Sanders
S. Stasek

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Response to Request for Additional Information-TAC MB5173

Question 1:

In Section B of Enclosure 1 to Reference 2, Affected Instrument Channels, trip units were not listed as components specific to the time response testing elimination request. Clarify that the trip units for which response time testing elimination is being requested are a part of the license amendment request. Include model information on the specific components.

Response to Question 1:

The following corrects and expands on the information listed in Section B of Enclosure 1 to Reference 2, Affected Instrument Channels.

Those components applicable to the requested changes are:

Trip Units, Rosemont 510DU/710DU
Agastat EGPB relays (incorrectly listed as EGPI on the original submittal *)
GE HFA relays, 12HFA151A9
Scram Contactor, GE CR 305

* NEDO-32291-A, Supplement 1, approves both the EGPB (24 vdc) and EGPI (120 vac)

Question 2:

Provide information in Enclosure 4 to Reference 2, Response to the Conditions Included in the NRC Staff's Safety Evaluation Accepting NEDO-32291-A, Supplement 1, for the trip units.

Response to Question 2:

The following expands on the information provided in Enclosure 4 to Reference 2, Response to the Conditions Included in the NRC Staff's Safety Evaluation Accepting NEDO-32291-A, Supplement 1, for the trip units.

The Safety Evaluation Report states:

5. **For trip units if the following requirements are met, no credible failure will increase response time to more than 24 ms without being detected by tests other than RTT.**

a. The trip units are procured by the utility as "nuclear safety related", or are dedicated for nuclear-safety-related application under a utility dedication program.

Detroit Edison Response:

Fermi 2 trip units in the Reactor Protection System/Primary Containment Isolation Instrumentation are procured as "nuclear-safety-related".

Question 3:

For the tables included in Section B of Enclosure 1 to Reference 2, Affected Instrument Channels, what are the specific manufacturer and models of components for which time response testing elimination is being requested? Include information for the sensors.

Response to Question 3:

The following expands on the information provided in Section B of Enclosure 1 to Reference 2, Affected Instrument Channels, by adding a row for component manufacturer/model, including the sensors, and a note below the tables.

The following tables show Fermi 2 BRT calculation using Reference: NEDO-32291-A Supplement 1, Table C.2-1 "Component Sets and Component BRT's."

Loop Type H

reactor vessel water level-low, level 3

Component	Sensor	Trip Unit (TU)	TU Output Relay	Logic Relay	Output Contactor	Loop Logic BRT	Channel BRT
Response Time	429 ms	24 ms	140 ms	40 ms	45 ms	249 ms	.678 sec
Manufacturer /Model	Rosemont 1153DB**	Rosemont 510DU/ 710DU	Agastat EGPB	GE 12HFA151A9	GE CR305	NA	NA

reactor vessel steam dome pressure high

Component	Sensor	Trip Unit (TU)	TU Output Relay	Logic Relay	Output Contactor	Loop Logic BRT	Channel BRT
Response Time	200 ms	24 ms	140 ms	40 ms	45 ms	249 ms	.449 sec
Manufacturer /Model	Rosemont 1153GB**	Rosemont 510DU/ 710DU	Agastat EGPB	GE 12HFA151A9	GE CR305	NA	NA

Loop Type E* (* Additional Auxiliary Relay)

reactor vessel water level-low low low, level 1

Component	Sensor	Trip Unit (TU)	TU Output Relay	Logic Relay	Auxiliary Relay	Output Relay	Loop Logic BRT	Channel BRT
Response Time	400 ms	24 ms	140 ms	40 ms	40 ms	40 ms	284 ms	.684 sec
Manufacturer /Model	Rosemont 1153DB**	Rosemont 510DU/ 710DU	Agastat EGPB	GE 12HFA1 51A9	GE 12HFA1 51A9	GE 12HFA1 51A9	NA	NA

main steam line flow-high

Component	Sensor	Trip Unit (TU)	TU Output Relay	Logic Relay	Auxiliary Relay	Output Relay	Loop Logic BRT	Channel BRT
Response Time	110 ms	24 ms	140 ms	40 ms	40 ms	40 ms	284 ms	.394 sec
Manufacturer /Model	Rosemont 1151DP** 1152DP**	Rosemont 510DU/ 710DU	Agastat EGPB	GE 12HFA1 51A9	GE 12HFA1 51A9	GE 12HFA1 51A9	NA	NA

**The manufacturer and model numbers for the sensors are included in Table 7-1 of NEDO 32291-A, October 1995. The sensor response times are different based on the sensor range code and the intended design function. The response time for the sensors are less than or equal to the acceptable limits specified by the manufacturer and within the Bounding Response Time (BRT) for the intended design function. This is documented in Fermi Design Calculation DC-4768 Volume I, Revision 0.