

**Detroit Edison**



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September 4, 2002  
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Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: T-6 D59  
U. S. Nuclear Regulatory Commission  
Washington D C 20555-0001

Reference: Request for Comment  
Federal Register Notice (67FR50475),  
dated August 2, 2002

Subject: Response to Request for Comment on Model Safety  
Evaluation on Technical Specification Improvement to  
Modify Requirements Regarding Mode Change Limitations  
Using the Consolidated Line Item Improvement Process

Detroit Edison, owner and operator of the Fermi 2 Nuclear Power Plant, wishes to comment on the Proposed Standard Technical Specification improvement as described in Technical Specification Task Force (TSTF) 359 and the above referenced Federal Register Notice (FRN).

The FRN includes a table that identifies certain higher risk systems, structures or components (SSC's) that should be excluded from the proposed relaxations being promulgated by TSTF-359, based upon generic risk assessments performed by the Nuclear Steam Supply System Owners Groups.

For Boiling Water Reactors (BWRs) with Mark 1 containments, the Table lists the Hardened Wetwell Vent as such a SSC that should be excluded. However, the Hardened Wetwell Vent is not a SSC included within Technical Specifications (TS). Thus, the proposed TSTF implies that TS Actions should be applied to a non-technical specification SSC. This is inappropriate and not necessary to properly

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manage overall plant risk. The existing plant programs that implement the Maintenance Rule (10CFR50.65(a)(4)) are the appropriate mechanism for this specific SSC. Consequently, we request that TSTF-359 be clarified to not include the Hardened Wetwell Vent.

Second, this table and the accompanying mark-up of the actual TS pages for BWRs included in TSTF-359, Revision 7 state that the Limiting Condition for Operation (LCO) 3.0.4.b exclusion note should be added to the TS LCO 3.4.9 -Residual Heat Removal (RHR) Shutdown Cooling System– Cold Shutdown, such that a MODE change from MODE 5 to MODE 4 would be precluded with LCO 3.4.9 not met. However, LCO 3.0.4 only applies to MODE changes in MODES 1, 2 or 3. Thus, the proposed change to LCO 3.4.9 is inconsistent with the existing wording of the LCO 3.0.4 applicability. Therefore, we believe that the LCO 3.0.4 Note to LCO 3.4.9 should not be included in the proposed changes.

Should you have any questions or require additional information, please contact me at (734) 586-4258.

Sincerely,



Norman K. Peterson  
Manager – Nuclear Licensing