

William T. O'Connor, Jr.
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DTE Energy



10 CFR 50.90

December 30, 2003
NRC-03-0104

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 License Amendment for the Deferral of Control Room Emergency Filtration System Technical Specification Surveillance Requirement 3.7.3.6," NRC 03-0064, dated October 10, 2003

Subject: Additional Information Regarding the Proposed License Amendment for the Deferral of Control Room Emergency Filtration System Technical Specification Surveillance Requirement 3.7.3.6

Detroit Edison proposed in Reference 2 to amend Facility Operating License NPF-43 to permit a one-time extension of Surveillance Requirement (SR) 3.7.3.6, which requires verification that unfiltered inleakage from Control Room Emergency Filtration (CREF) system duct work outside the Control Room Envelope (CRE) is within limits. This SR is required to be performed once every 36 months, and can be performed only when the CREF system is not required to be Operable (i.e., in MODES 4 or 5, with no operations with a potential for draining the reactor vessel (OPDRV's) and with no fuel movement of recently irradiated fuel in progress).

In reviewing this proposed deferral, the NRC staff has requested that Detroit Edison commit to perform this surveillance prior to the next refueling outage should an outage of sufficient duration occur. The SR takes approximately 7 days in MODE 4 to perform, provided there is no other interfering work in the area. Additionally, the final planning, staging and setup takes approximately 3 days. Therefore, with these constraints in mind, Detroit Edison commits to perform SR 3.7.3.6 should an outage

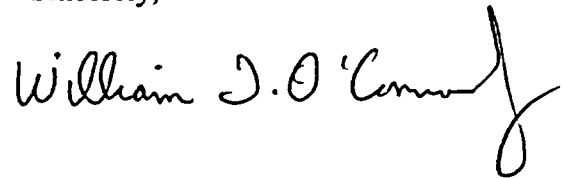
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of sufficient duration occur prior to the next refueling outage. An outage of sufficient duration will be defined for these purposes as one in which it is planned that the plant will be in MODE 4 for greater than 10 days, with the additional provision that planned or emergent work does not interfere with the setup or the performance of this SR.

As discussed in our original submittal (Reference 2), another surveillance related to duct integrity (SR 3.7.3.3) is performed every 12 months. This surveillance verifies that the silicone sealant applied to the duct work outside of the control room envelope has not degraded by requiring a visual inspection for cracking, debonding, and other abnormal degradation of the applied silicone sealant. This surveillance was recently completed on November 26, 2003, with satisfactory results. No indications of cracking, debonding, and other abnormal degradation were observed.

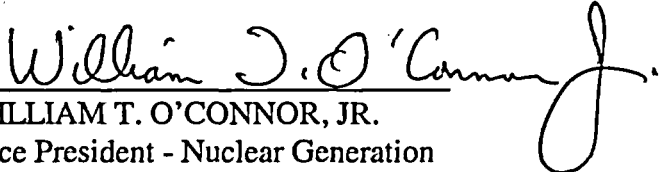
Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,



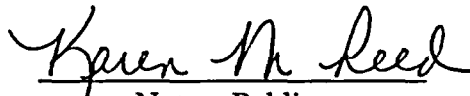
cc: H. K. Chernoff
M. A. Ring
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

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 30th day of December, 2003 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