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DTE Energy



10 CFR 50.90

January 30, 2004
NRC-04-0004

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: Proposed License Amendment to Revise Technical Specification
3.3.6.2, "Secondary Containment Isolation Instrumentation"

Pursuant to 10 CFR 50.90, Detroit Edison hereby requests the following amendment. The proposed change would add the words, "not met", to the end of the sentence; "Required Action and associated Completion Time" within Technical Specifications (TS) 3.3.6.2 (Secondary Containment Isolation Instrumentation), Condition C. Therefore, the proposed change would amend the sentence to state, "Required Action and associated Completion Time not met." The omission of the words, "not met", was an oversight during the change to the Improved Standard Technical Specifications.

Detroit Edison requests approval of the proposed License Amendment by January 31, 2005 with the amendment being implemented within 30 days following approval.

Enclosure 1 contains an evaluation, including a significant hazards consideration, of the proposed change. Enclosure 2 contains a copy of the existing TS page marked up to show the proposed change. Enclosure 3 contains a copy of the proposed revised TS page. There are no new regulatory commitments associated with this proposed change.

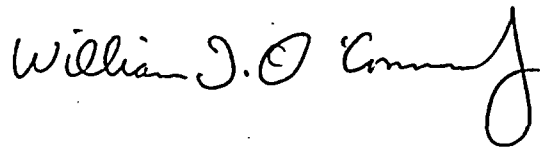
A-001

Detroit Edison has reviewed the proposed change against the criteria of 10 CFR 51.22 for environmental considerations. The proposed amendment is confined to 10 CFR 51.22(c)(10)(ii) involving record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

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

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

Sincerely,

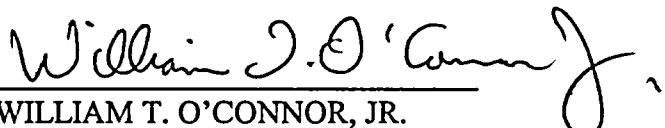
A handwritten signature in dark ink, appearing to read "William J. O'Connor". The signature is fluid and cursive, with a large, stylized "O" and a long, sweeping tail that extends to the right.

Enclosures:

1. Fermi 2 Nuclear Power Plant Evaluation for License Amendment Request
2. Proposed Technical Specification Changes (Mark-Up)
3. Proposed Technical Specification Revised Page


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

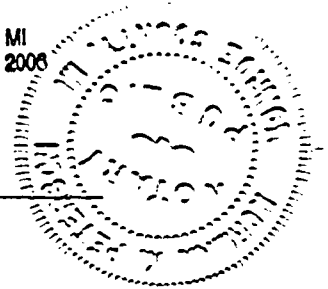
I, WILLIAM T. O'CONNOR, JR., do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


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

On this 30th day of January, 2004 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.

NORMAN K. PETERSON
NOTARY PUBLIC MONROE CO., MI
MY COMMISSION EXPIRES JUL 24, 2008


Notary Public



**ENCLOSURE 1 to
NRC-04-0004**

**FERMI 2 NUCLEAR POWER PLANT
EVALUATION FOR LICENSE AMENDMENT REQUEST**

**FERMI 2 NUCLEAR POWER PLANT
EVALUATION**

SUBJECT: Revise Technical Specification (TS) 3.3.6.2, Secondary Containment Isolation Instrumentation, To Correct A Statement In Condition C.

1. DESCRIPTION
2. PROPOSED CHANGE
3. BACKGROUND
4. TECHNICAL ANALYSIS
5. REGULATORY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements / Criteria
6. ENVIRONMENTAL CONSIDERATION
7. REFERENCES

1.0 DESCRIPTION:

The proposed change would revise the wording in Condition C of TS 3.3.6.2, Secondary Containment Isolation Instrumentation, from "Required Action and associated Completion Time" to "Required Action and associated Completion Time not met." The words "not met" were inadvertently omitted during TS Amendment No. 134 to implement the Improved Standard Technical Specification (ISTS), NUREG 1433. This proposed change will correct the statement.

2.0 PROPOSED CHANGE:

The proposed change would revise the wording in TS 3.3.6.2 Condition C to add the term, "not met" to the end of the sentence. Currently, Condition C reads, "Required Action and associated Completion Time." The proposed change would read, "Required Action and associated Completion Time not met."

3.0 BACKGROUND:

The Secondary Containment Isolation Instrumentation automatically initiates closure of appropriate secondary containment isolation valves, trips the Reactor Building Heating Ventilation and Air Conditioning System, and starts the Standby Gas Treatment System to limit fission product release during and following a postulated design basis accident. The proposed change involves the Secondary Containment Isolation Instrumentation which includes Reactor Vessel low water level, Drywell high pressure, Fuel Pool Ventilation Exhaust high radiation, and manual initiation.

During implementation of the ISTS, a typographical error was made which resulted in the omission of the term "not met" in TS 3.3.6.2 Condition C. TS 3.3.6.2 describes the Secondary Containment Isolation Instrumentation.

4.0 TECHNICAL ANALYSIS:

This proposed change is a typographical error. Correcting this error will add clarity to the statement as well as add consistency to the TS. TS 3.3.6.2 Condition C is similar to many other sections of the TS pertaining to a condition not being met. Therefore, this terminology is implied. This proposed change will not impact the technical content TS 3.3.6.2 involving any actions for the Secondary Containment Isolation Instrumentation.

5.0 REGULATORY SAFETY ANALYSIS:

5.1 No Significant Hazards Consideration

The proposed change would revise the wording in Condition C of TS 3.3.6.2, Secondary Containment Isolation Instrumentation, from "Required Action and associated Completion Time" to "Required Action and associated Completion Time not met." The words "not met" were inadvertently omitted during TS Amendment No. 134 to implement the ISTS, NUREG 1433. This proposed change will correct the statement. Detroit Edison has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as described below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change corrects the sentence in Condition C of TS 3.3.6.2 by indicating that when this condition is not met, certain actions are required. This terminology is prevalent throughout the ISTS and is implied in this section as well. No changes in operating practices or physical plant equipment are created as a result of this terminology addition. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different type of accident from any accident previously evaluated?

Response: No.

This proposed change is a correction of an action statement in TS 3.3.6.2. No physical change in plant equipment will result from this proposed change. Therefore, the proposed change does not create the possibility of a new or different type of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change is editorial in nature and only provides a correction to an action statement in the Secondary Containment Isolation Instrumentation involving inoperable channels and automatic functions to agree with NUREG 1433. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

5.2 Applicable Regulatory Requirements / Criteria

The technical content of TS 3.3.6.2 will not be changed as a result of this proposed amendment. Adding the words "not met" to the sentence in TS 3.3.6.2 Condition C is considered an improvement which corrects an omission which occurred during implementation of the ISTS. Although these words "not met" are implied in Condition C, this proposed amendment will clarify the meaning of this sentence and is judged to have no impact on regulatory requirements or regulatory criteria.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not adversely affect the common defense and security or the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION:

The proposed amendment is confined to 10 CFR 51.22(c)(10)(ii) involving record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

7.0 REFERENCES:

1. TS 3.3.6.2, Secondary Containment Isolation Instrumentation

**ENCLOSURE 2 to
NRC-04-0004**

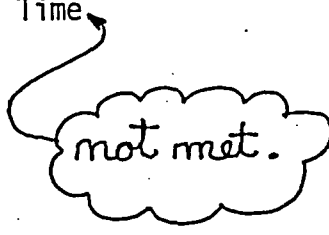
PROPOSED TECHNICAL SPECIFICATION CHANGE (MARK-UP)

INCLUDED PAGE:

TS 3.3-60

Secondary Containment Isolation Instrumentation
3.3.6.2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time 	C.1.1 Isolate the Secondary Containment.	1 hour
	<u>OR</u>	
	C.1.2 Declare associated secondary containment isolation valves inoperable.	1 hour
	<u>AND</u>	
	C.2.1 Place the associated standby gas treatment (SGT) subsystem(s) in operation.	1 hour
	<u>OR</u>	
	C.2.2 Declare associated SGT subsystem(s) inoperable.	1 hour

**ENCLOSURE 3 to
NRC-04-0004**

PROPOSED TECHNICAL SPECIFICATION REVISED PAGE

INCLUDED PAGE:

TS 3.3-60

Secondary Containment Isolation Instrumentation
3.3.6.2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1.1 Isolate the Secondary Containment.	1 hour
	<u>OR</u>	
	C.1.2 Declare associated secondary containment isolation valves inoperable.	1 hour
	<u>AND</u>	
	C.2.1 Place the associated standby gas treatment (SGT) subsystem(s) in operation.	1 hour
	<u>OR</u>	
	C.2.2 Declare associated SGT subsystem(s) inoperable.	1 hour