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DTE Energy

10 CFR 50.90

March 19, 2004
NRC-04-0006

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 3.3.6.1, "Primary Containment Isolation Instrumentation"

Pursuant to 10 CFR 50.90, Detroit Edison hereby requests the following amendment. The proposed change would correct a formatting error introduced during conversion to Improved Technical Specifications by replacing "1 per room" with "2" for the Required Channels Per Trip System for the Reactor Water Cleanup Area Ventilation Differential Temperature - High primary containment isolation instrumentation. This inaccuracy was introduced during the change to the Improved Standard Technical Specifications (ISTS).

Detroit Edison requests approval of the proposed License Amendment by March 18, 2005, with the amendment being implemented within 90 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 Technical Specification (TS) page marked up to show the proposed change. Enclosure 3 contains a copy of the proposed revised TS page. Enclosure 4 provides marked up pages of the existing TS Bases showing the proposed changes (for information only). There are no new regulatory commitments associated with this proposed change.

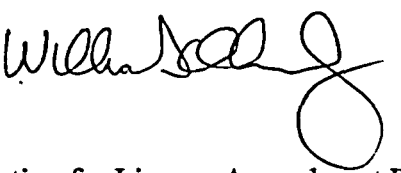
A001

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,



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
4. Enclosure 4 provides marked up pages of the existing TS Bases showing the proposed changes (for information only).

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 19th day of March, 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.

Notary Public

KAREN M. REED
Notary Public, Monroe County, MI
My Commission Expires 09/02/2005

ENCLOSURE 1 to
NRC-04-0006

FERMI 2 NUCLEAR POWER PLANT

EVALUATION FOR LICENSE AMENDMENT REQUEST

FERMI 2 NUCLEAR POWER PLANT

EVALUATION

SUBJECT: Revise Technical Specification (TS) 3.3.6.1, Primary Containment Isolation Instrumentation.

1.0 DESCRIPTION:

The proposed change would replace "1 per room" with "2" for the Required Channels Per Trip System for the Reactor Water Cleanup (RWCU) Area Ventilation Differential Temperature - High isolation, Function 5.c of Table 3.3.6.1-1 of Technical Specification (TS) 3.3.6.1, Primary Containment Isolation Instrumentation. This formatting error was introduced during TS Amendment No. 134 to implement the Improved Standard Technical Specification (ISTS), NUREG 1433.

As a result of this formatting error, the actions specified by TS 3.3.6.1, Primary Containment Isolation Instrumentation, are inconsistent with other RWCU isolation instruments listed in Table 3.3.6.1-1. Administrative controls have been placed in the TS Bases using the guidance provided in NRC Administrative Letter 98-10, "Dispositioning Of Technical Specifications That Are Insufficient To Assure Plant Safety". The administrative controls are in place as a conservative measure, to ensure consistent implementation of the TS until implementation of this amendment request.

2.0 PROPOSED CHANGE:

The proposed change would restore the pre-Improved Technical Specification (ITS) value of "2" for the Required Channels Per Trip System for the RWCU Area Ventilation Differential Temperature - High on Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation. Additionally, an explanatory note is added to Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation

3.0 BACKGROUND:

The RWCU Area Ventilation Differential Temperature - High primary containment isolation instrumentation is provided to detect a leak from the RWCU system. The isolation signal is redundant to the RWCU Area Temperature - High isolation signal and diverse to the high differential flow instrumentation for the hot portions of the RWCU system. If a small leak were to occur and continue without isolation, offsite dose limits could be reached. Credit for RWCU Area Temperature - High and RWCU Area Ventilation Differential Temperature - High instruments is not taken in any transient or accident analysis in the Updated Final Safety Analysis (UFSAR), since bounding analyses are performed for large breaks such as recirculation or main steam line breaks.

RWCU Area Temperature and Area Ventilation Differential Temperature signals are initiated from temperature elements that are located in the area or room that is being monitored. The RWCU Area Temperature instrumentation monitors 6 areas. The RWCU Area Ventilation Differential Temperature instrumentation monitors 4 rooms; the A RWCU Pump room, B RWCU Pump Room, RWCU Heat Exchanger Room, and RWCU Phase Separator Room.

In the conversion to ISTS, the table column for "Minimum Operable Channels Per Trip System" was changed to "Required Channels Per Trip System".

Twelve thermocouples provide input to the RWCU Area Temperature – High Function (two per area). Two channels per area are required to be operable to ensure that no single instrument failure can preclude the isolation function. TS Amendment No. 134 which implemented the ISTS, correctly changed the "6" (Minimum Operable Channels Per Trip System) to "1 per area" (Required Channels Per Trip System) for this function. This change was correct because it ensures at least one channel per area is operable.

Eight thermocouples provide input to the RWCU Area Ventilation Differential Temperature – High Function. Two thermocouples are required for each channel, one each in the inlet and outlet of the room cooling systems, for a total of four channels (one channel per room). TS Amendment No. 134 which implemented the ISTS, incorrectly formatted the "2" (Minimum Operable Channels Per Trip System) to "1 per room" (Required Channels Per Trip System) for this function. This change was incorrect because Fermi's accepted design is four channels (one channel per room) for RWCU Area Ventilation Differential Temperature – High. The correct number of Required Channels Per Trip System is two.

4.0 TECHNICAL ANALYSIS:

The proposed license amendment restores "2" as the number of Required Channels Per Trip System for the RWCU Area Ventilation Differential Temperature - High isolation, Function 5.c of Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation.

This formatting error was introduced during TS Amendment No. 134 which implemented the ISTS (TAC NO. MA1465). In Table A, Administrative Changes to Current Technical Specifications, of the NRC Safety Evaluation (ITS Section 3.3.6.1, A.13), the change from "2" to "1/room" was described as an administrative change to better specify the number of channels for each trip system. This change was made to match the nomenclature used in ISTS and to specify the number of instruments per room.

The Fermi TS bases for the RWCU Area Ventilation Differential Temperature - High isolation Function were reworded from the ISTS bases during conversion to ITS. The changes were made to reflect the plant specific instrumentation at Fermi. The bases acknowledge that there are a total of four Area Differential Temperature - High monitors for RWCU, one per room.

The Fermi design for the RWCU Area Ventilation Differential Temperature - High isolation Function does not match the design used in the ISTS and this change to the number of Required Channels Per Trip System should not have been made. Fermi is designed with one differential temperature monitor per room as opposed to the ISTS design of two differential temperature monitors per room. The Fermi design for the RWCU Area Ventilation Differential Temperature -

High isolation Function is described in a License Amendment Request (Reference 1) dated December 22, 1988, subsequently issued to Fermi as TS Amendment No. 41 (TAC NO. 72759).

In summary, the proposed change to the RWCU Area Ventilation Differential Temperature - High isolation, Function 5.c of Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation, restores the TS to be consistent with the Fermi 2 design.

5.0 REGULATORY SAFETY ANALYSIS:

5.1 No Significant Hazards Consideration

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 restores the number of Required Channels Per Trip System of the RWCU Area Ventilation Differential Temperature - High isolation, Function 5.c of Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation, to its pre-ITS value and adds an explanatory note. No changes in operating practices or physical plant equipment are created as a result of this change. 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.

   The proposed change restores the number of Required Channels Per Trip System of the RWCU Area Ventilation Differential Temperature - High isolation, Function 5.c of Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation, to its pre-ITS value and adds an explanatory note. 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 administrative in nature and only provides a correction to Table 3.3.6.1-1 of TS 3.3.6.1, Primary Containment Isolation Instrumentation, as well as an explanatory note. 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 3.3.6.1 will not be changed as a result of this proposed amendment. The proposed change corrects a formatting error introduced during implementation of the ISTS 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) changes 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. Letter to NRC: NRC-88-0279, Proposed Technical Specification Change (License Amendment) – Isolation Actuation Instrumentation (3/4.3.2), dated December 22, 1988.

ENCLOSURE 2 to
NRC-04-0006

PROPOSED TECHNICAL SPECIFICATION CHANGE (MARK-UP)

INCLUDED PAGE:

TS 3.3-58

Table 3.3.6.1-1 (page 4 of 4)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. Reactor Water Cleanup (RWCU) System Isolation					
a. Differential Flow – High	1,2,3	1	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 63.4 gpm
b. Area Temperature – High	1,2,3	1 per area	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 183°F
c. Area Ventilation Differential Temperature – High	1,2,3	~~1 per room~~ 2(d)	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 53°F
d. SLC System Initiation	1,2	2(b)	I	SR 3.3.6.1.5	NA
e. Reactor Vessel Water Level – Low Low, Level 2	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≥ 103.8 inches
f. Manual Initiation	1,2,3	1 per valve	G	SR 3.3.6.1.6	NA
6. Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure – High	1,2,3	1	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 95.5 psig
b. Reactor Vessel Water Level – Low, Level 3	3,4,5	2(c)	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≥ 171.9 inches
c. Manual Initiation	1,2,3	1 per valve	G	SR 3.3.6.1.6	NA

(b) SLC System Initiation only inputs into one of the two trip systems.

(c) Only one trip system required in MODES 4 and 5 when RHR Shutdown Cooling System integrity maintained.

(d) Fermi design requires only 1 channel per trip system to be OPERABLE to maintain isolation capability. — add

ENCLOSURE 3 to
NRC-04-0006

PROPOSED TECHNICAL SPECIFICATION REVISED PAGE

INCLUDED PAGE:

TS 3.3-58

Table 3.3.6.1-1 (page 4 of 4)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. Reactor Water Cleanup (RWCU) System Isolation					
a. Differential Flow– High	1,2,3	1	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 63.4 gpm
b. Area Temperature– High	1,2,3	1 per area	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 183°F
c. Area Ventilation Differential Temperature– High	1,2,3	2(d)	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 53°F
d. SLC System Initiation	1,2	2(b)	I	SR 3.3.6.1.5	NA
e. Reactor Vessel Water Level– Low Low, Level 2	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≥ 103.8 inches
f. Manual Initiation	1,2,3	1 per valve	G	SR 3.3.6.1.6	NA
6. Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure– High	1,2,3	1	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≤ 95.5 psig
b. Reactor Vessel Water Level– Low, Level 3	3,4,5	2(c)	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.5	≥ 171.9 inches
c. Manual Initiation	1,2,3	1 per valve	G	SR 3.3.6.1.6	NA

(b) SLC System Initiation only inputs into one of the two trip systems.

(c) Only one trip system required in MODES 4 and 5 when RHR Shutdown Cooling System integrity maintained.

(d) Fermi design requires only 1 channel per trip system to be OPERABLE to maintain isolation capability.

ENCLOSURE 4 to
NRC-04-0006

PROPOSED TECHNICAL SPECIFICATION BASES CHANGE
(FOR INFORMATION ONLY)

INCLUDED PAGES:

B 3.3.6.1-19
B 3.3.6.1-24
B 3.3.6.1-25
B 3.3.6.1-29
B 3.3.6.1-32

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Differential Flow–High Allowable Value ensures that a break of the RWCU piping is detected.

This Function isolates the RWCU isolation valves.

5.b., 5.c. Area and Area Ventilation Differential Temperature–High

RWCU area and area ventilation differential temperatures are provided to detect a leak from the RWCU System. The isolation occurs even when very small leaks have occurred and is diverse to the high differential flow instrumentation for the hot portions of the RWCU System. If the small leak continues without isolation, offsite dose limits may be reached. Credit for these instruments is not taken in any transient or accident analysis in the UFSAR, since bounding analyses are performed for large breaks such as recirculation or MSL breaks.

Area and area ventilation differential temperature signals are initiated from temperature elements that are located in the area or room that is being monitored. Twelve thermocouples provide input to the Area Temperature–High Function (two per area). Two channels per area are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

Eight thermocouples provide input to the Area Ventilation Differential Temperature–High Function. The output of these thermocouples is used to determine the differential temperature in four rooms containing RWCU piping and equipment. Each channel consists of a differential temperature instrument that receives inputs from thermocouples that are located in the inlet and outlet of the room cooling system and for a total of four available channels (one per room).

One channel per trip system is required to be OPERABLE to maintain isolation capability

The Area and Area Ventilation Differential Temperature–High Allowable Values are set low enough to detect a leak equivalent to 25 gpm.

These Functions isolate the RWCU isolation valves, as appropriate.

BASES

ACTIONS (continued)

Condition. However, the Required Actions for inoperable primary containment isolation instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable primary containment isolation instrumentation channel.

A.1

Because of the diversity of sensors available to provide isolation signals and the redundancy of the isolation design, an allowable out of service time of 12 hours for Functions 1.f, 2.a, 2.c, and 6.b and 24 hours for Functions other than Functions 1.f, 2.a, 2.c, and 6.b has been shown to be acceptable (Refs. 5 and 6) to permit restoration of any inoperable channel to OPERABLE status. This out of service time is only acceptable provided the associated Function is still maintaining isolation capability (refer to Required Action B.1 Bases). If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action A.1. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue with no further restrictions. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an isolation), Condition C must be entered and its Required Action taken. ~~As an administrative control (reference 12) with one or more RWCU Area Ventilation Differential Temperature-High instruments inoperable TS 3.3.6.1, Condition B.1 should be entered.~~

B.1

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in redundant automatic isolation capability being lost for the associated penetration flow path(s). The MSL Isolation Functions are considered to be maintaining isolation capability when sufficient channels are OPERABLE or in trip, such that both trip systems will generate a trip signal from the given Function on a valid signal. The other isolation functions are considered to be maintaining isolation capability when sufficient channels are OPERABLE or in trip, such that one

BASES

ACTIONS (continued)

trip system will generate a trip signal from the given Function on a valid signal. This ensures that one of the two PCIVs in the associated penetration flow path can receive an isolation signal from the given Function. For Functions 1.a, 1.b, 1.d, and 1.f, this would require both trip systems to have one channel OPERABLE or in trip. For Function 1.c, this would require both trip systems to have one channel, associated with each MSL, OPERABLE or in trip. For Functions 1.e and 1.g, each Function consists of channels that monitor several locations within a given area (e.g., different locations within the main steam tunnel area). Therefore, this would require both trip systems to have one channel per location OPERABLE or in trip. For Functions 2.a, 2.b, 2.c, 3.b, 3.c, 4.b, 4.c, 5.e, and 6.b, this would require one trip system to have two channels, each OPERABLE or in trip. For Functions 3.a, 3.d, 4.a, 4.d, 5.a, 5.d, and 6.a, this would require one trip system to have one channel OPERABLE or in trip. ~~For~~ Functions 5.b ~~and 5.c, each Function~~ consists of channels that monitor several different locations. Therefore, this would require one channel per location to be OPERABLE or in trip (the channels are not required to be in the same trip system). The Condition does not include the Manual Initiation Functions (Functions 1.h, 2.d, 3.f, 4.f, 5.f, and 6.c), since they are not assumed in any accident or transient analysis. Thus, a total loss of manual initiation capability for 24 hours (as allowed by Required Action A.1) is allowed. ~~As an administrative control (reference 12)~~ Condition B.1 is to be used for an inoperable RWCU Area Ventilation Differential Temperature-High instrument. It is recognized that application of Condition B when a single channel of RWCU Area Ventilation Differential Temperature-High is inoperable is conservative in this context. However, in the most restrictive reading of Condition B, isolation capability for RWCU Area Ventilation Differential Temperature-High for a given room is not maintained if the channel is inoperable.

Function 5.c consists of four channels, one per room, and would require both trip systems to have one channel OPERABLE.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

BASES

SURVEILLANCE REQUIREMENTS (continued)

(Refs. 5 and 6) assumption of the average time required to perform channel surveillance. That analysis demonstrated that the testing allowance does not significantly reduce the probability that the PCIVs will isolate the penetration flow path(s) when necessary.

~~As an administrative control (reference 12) a RWCU Area Ventilation Differential Temperature-High instrument is allowed to be inoperable for up to 6 hours to perform surveillance testing.~~

SR 3.3.6.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.6.1.2 and SR 3.3.6.1.6

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL

BASES

SURVEILLANCE REQUIREMENTS (continued)

ISOLATION SYSTEM RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. The 18 month Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience that shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

REFERENCES

1. UFSAR, Section 6.3.
2. UFSAR, Chapter 15.
3. NEDO-31466, "Technical Specification Screening Criteria Application and Risk Assessment," November 1987.
4. UFSAR, Section 4.5.2.4.
5. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.
6. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.
7. UFSAR, Section 7.3.
8. UFSAR, Section 6.2.
9. NEDO-31400, "Safety Evaluation for Eliminating the BWR MSIV Closure Function and Scram Function of the MSL Radiation Monitor," Licensing Topical Plant Report for BWROG.
10. NEDO-32291, "System Analysis for Elimination of Selected Response Time Testing Requirements," January 1994; and Fermi-2 SER for Amendment 111, dated April 18, 1997.
11. NEDO-32291-A, Supplement 1, "System Analyses for The Elimination of Selected Response Time Testing Requirement," October 1999.
12. ~~NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety".~~