

Donald K. Cobb
Assistant Vice President, Nuclear Generation

Fermi 2
6400 North Dixie Hwy., Newport, MI 48166
Tel: 734.586.5201 Fax: 734.586.4172

DTE Energy



February 5, 2006
NRC-06-0010

10 CFR 50.90

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: Emergency License Amendment Request for One-Time Extension of
Allowed Outage Time for the Fermi 2 Emergency Diesel Generator 12

Pursuant to 10 CFR 50.90, Detroit Edison hereby requests the following amendment. Detroit Edison proposes to add a license condition allowing a one-time extension of the allowed outage time for Emergency Diesel Generator (EDG) 12 from seven days to 14 days. The extension would allow continued operation of the unit while repairs, post-maintenance testing and surveillance testing of the EDG are completed. The proposed amendment is being requested on an emergency basis pursuant to 10 CFR 50.91(a)(5).

On January 30, 2006, at 0200 hours, EDG 12 was declared inoperable for a scheduled safety system outage, entering the seven day action statement of Technical Specification (TS) 3.8.1, Condition A. During the outage it was determined that a bearing and a piston needed to be replaced. Following these repairs and the completion of the safety system outage, the following additional unexpected events were experienced:

- EDG 12 tripped on an overvoltage condition during startup for a post-maintenance test run.
- The EDG 12 output breaker failed to open upon completion of a post-maintenance test run.

The EDG 12 output breaker that failed was a refurbished breaker that had been installed during the safety system outage. After failing to open, the breaker was replaced with the original output breaker. Investigation has determined that the refurbished breaker installed in position 12EB-EB3, during this EDG 12 outage, had physical tolerance

A001

differences from the originally installed breaker. This dimensional difference impacted the fit of the refurbished breaker into the EDG output breaker cubicle. EDG 11, 13, and 14 have had refurbished breakers successfully installed and tested. This failure mode is not common to EDG 11, 13, and 14.

The overvoltage failure is not considered to be due to a common cause. The most probable cause for the overvoltage was relaxation of the spring clip that holds the fuse in the voltage regulator sensing circuit. This is supported by the subsequent finding of intermittent discontinuity at one fuse terminal and previous use of the fuse/spring clip as a tagging point for the EDG.

The EDG 12 seven day LCO expires February 6, 2006, at 0200 hours.

Detroit Edison could not have reasonably foreseen exceeding the seven day Completion Time of TS LCO 3.8.1. The original EDG 12 safety system outage schedule was extended when routine maintenance inspections determined that a bearing and a piston needed to be replaced. Replacement of the bearing and piston was beyond the planned scope of the safety system outage. The time required to replace the bearing and piston did not, by themselves, extend the completion time of the outage, but multiple runs for post-maintenance break-in and testing were required. This extended the outage, originally scheduled for 3 days and 19 hours, to 4 days and 11 hours. Additional time has been added to the outage due to the unexpected conditions requiring EDG 12 output breaker replacement and correction of the EDG 12 output overvoltage trip condition.

Completion of repairs, post-maintenance testing and surveillance testing to establish operability will not likely be completed prior to expiration of the seven day allowed outage time. Detroit Edison is requesting a one time extension of this seven day allowed outage time by an additional seven days to assure adequate time is available for completion of repairs, post-maintenance testing and surveillance testing of the EDG.

Detroit Edison has determined that the risk of the requested extension does not warrant subjecting the unit to a shutdown transient. This requested extension would be limited to the current period of EDG inoperability.

Enclosure 1 provides a detailed description and safety analysis to support the proposed amendment, including detailed justification for approving the amendment on an emergency basis, an evaluation of significant hazards considerations pursuant to 10 CFR 50.92(c), and an environmental assessment. Enclosure 2 contains a copy of the existing License Condition page marked up to show the proposed change. Enclosure 3 contains a copy of the proposed revised License Condition page.

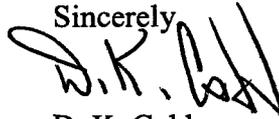
No previous submittals affect the license pages that are affected by this proposed amendment. If any future submittals affect these license pages, Detroit Edison will

coordinate the changes to the pages with the Nuclear Regulatory Commission (NRC) Project Manager to ensure proper page control when the associated license amendment requests are approved.

Detroit Edison requests approval of the proposed amendment by 0200 hours, February 6, 2006, to preclude unnecessary shutdown of Fermi 2. The proposed amendment will be implemented immediately following NRC approval. This letter contains no new regulatory commitments.

If you have any questions regarding this submittal, please contact Ronald W. Gaston at (734) 586-5197.

Sincerely



D. K. Cobb
Assistant Vice President
Nuclear Generation

Enclosures:

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

cc: D. H. Jaffe
T. J. Kozak
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, Donald K. Cobb, 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.



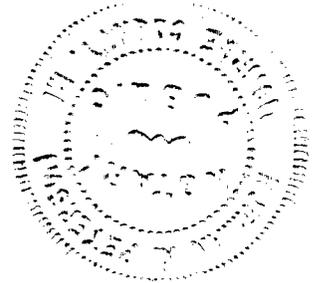
D. K. Cobb
Assistant Vice President
Nuclear Generation

On this 5th day of February, 2006 before me personally appeared Donald K. Cobb, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

NORMAN K. PETERSON
NOTARY PUBLIC MONROE CO., MI
MY COMMISSION EXPIRES Jul 24, 2006



bcc: G. D. Cerullo
D. K. Cobb
W. A. Colonnello
R. W. Gaston
R. W. Libra
M. A. Philippon
P. W. Smith
S. Stasek

Electronic Licensing Library (ELL) (200 TAC)
Information Management (140 NOC)
Michigan Department of Environmental Quality
Radiological Protection and Medical Waste Section
NSRG Administrator (200 TAC)
NRR Chron File

**ENCLOSURE 1 to
NRC-06-0010**

FERMI 2 NUCLEAR POWER PLANT

EVALUATION FOR LICENSE AMENDMENT REQUEST

FERMI 2 NUCLEAR POWER PLANT

EVALUATION

SUBJECT: Emergency License Amendment Request for One-Time Extension of Allowed Outage Time for the Fermi 2 Emergency Diesel Generator 12

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

1.0 DESCRIPTION:

Pursuant to 10 CFR 50.90, Detroit Edison hereby requests the following amendment. Detroit Edison proposes to add a license condition allowing a one-time extension of the allowed outage time for Emergency Diesel Generator (EDG) 12. The extension would allow continued operation of the unit while repairs and related testing of the EDG are completed. The proposed amendment is being requested on an emergency basis pursuant to 10 CFR 50.91(a)(5).

On January 30, 2006, at 0200 hours, EDG 12 was declared inoperable for a scheduled safety system outage, entering the seven day action statement of Technical Specification (TS) LCO 3.8.1, Condition A. During the outage, it was determined that a bearing and a piston needed to be replaced. Following these repairs and the completion of the safety system outage, the following three additional unexpected events were experienced:

- February 2, 2006, 0949 hours: EDG 12 tripped on overvoltage during a startup for post-maintenance testing. This condition appeared to be resolved. February 3, 2006, 1046 hours: EDG 12 is started in auto voltage control, output breaker is closed. The overvoltage trip condition did not recur.
- February 3, 2006, 1154 hours: EDG 12 output breaker fails to open upon completion of a post-maintenance test run.
- February 4, 2006, 0641 hours: EDG 12 tripped on overvoltage during a startup for post-maintenance testing. This is a repeat of the February 2 trip condition.

The EDG 12 output breaker that failed was a refurbished breaker that had been installed during the safety system outage. After failing to open, the breaker was replaced with the original output breaker. Investigation has determined that the refurbished breaker installed in position 12EB-EB3, during this EDG 12 outage, had physical tolerance differences from the originally installed breaker.

The overvoltage failure is not considered to be due to a common cause. The most probable cause for the overvoltage was relaxation of the spring clip that holds the fuse in the voltage regulator sensing circuit. This is supported by the subsequent finding of intermittent discontinuity at one fuse terminal and previous use of the fuse/spring clip as a tagging point for the EDG.

The EDG 12 seven day LCO expires February 6, 2006, at 0200 hours.

Detroit Edison could not have reasonably foreseen exceeding the seven day Completion Time of TS LCO 3.8.1. The original EDG 12 safety system outage schedule was extended when routine maintenance inspections determined that a bearing and a piston needed to be replaced and subsequent electrical problems in voltage regulation and the

EDG 12 output breaker. These events are described in more detail in the section discussing why the situation could not have been avoided, Section 3, below.

When the overvoltage condition has been corrected, there remains approximately 25 hours of post-maintenance testing and surveillance testing prior to declaring EDG 12 operable.

Completion of repairs, post-maintenance testing, and surveillance testing to establish operability will not likely be completed prior to expiration of the seven day allowed outage time. Detroit Edison is requesting a one time extension of this seven day allowed outage time by an additional seven days to assure adequate time is available for completion of repairs, post-maintenance testing, and surveillance testing of the EDG. Detroit Edison has determined that the risk of the requested allowed outage time extension does not warrant subjecting the unit to a shutdown transient. This requested extension would be limited to the current period of EDG inoperability.

2.0 PROPOSED CHANGE:

The proposed change would add a new License Condition to Section 2.C of the Fermi 2 Facility Operating License. The proposed License Condition is as follows:

The seven day allowed outage time of Technical Specification 3.8.1 Condition A, Required Action A.6, which was entered at January 30, 2006, at 0200 hours, may be extended one time by an additional seven days to complete repair and testing of EDG 12.

3.0 BACKGROUND:

Description of Events

Completion of troubleshooting, repairs, post-maintenance testing, and surveillance testing to establish operability will not be completed prior to expiration of the seven day allowed outage time. TS LCO 3.8.1, Condition C would require that the unit to be placed in Mode 3, Hot Shutdown, within 12 hours, and in Mode 4, Cold Shutdown, within the following 36 hours of the expiration time of 0200 hours on February 6, 2006.

The purpose of this amendment request is to request additional time in order to satisfactorily complete troubleshooting, repairs, post-maintenance testing, and surveillance testing. Detroit Edison has determined that the risk of extending the seven day allowed outage time by an additional seven days does not warrant subjecting the unit to a shutdown transient. Accordingly, Detroit Edison is requesting that the seven day allowed outage time specified by TS LCO 3.8.1, Condition A be extended one time by an

additional seven days to allow completion of repairs and retesting of EDG 12. This requested extension would be limited to the current period of EDG inoperability.

With EDG 12 inoperable for greater than seven days, a violation of TS LCO 3.8.1 would occur if action were not taken to initiate a plant shutdown. Thus, a TS amendment is needed to allow continued plant operation, utilizing an extension of the seven day Completion Time specified for one inoperable EDG per Required Action A.6 of TS LCO 3.8.1.

Basis for Current Requirements

The operability requirements for the alternating current power sources during plant operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant alternating power sources satisfy the requirements of General Design Criteria 17, "Electric Power Systems," of Appendix A to 10 CFR 50.

The TS Action requirements specified for the levels of degradation of the power sources provide restrictions for continued facility operation commensurate with the level of degradation. The operability requirements for the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one of each of the onsite alternating current power sources and associated distribution systems operable during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite alternating current source.

Reason for Requesting Emergency Amendment

Regulation 10 CFR 50.91(a)(5) states that where the Nuclear Regulatory Commission (NRC) finds that an emergency situation exists, in that failure to act in a timely manner would result in derating or shutdown of a nuclear power plant, or in prevention of either resumption of operation or of increase in power output up to the plant's licensed power level, it may issue a license amendment involving no significant hazards consideration without prior notice and opportunity for a hearing or for public comment. The regulation also states that the NRC will decline to dispense with notice and comment on the determination of no significant hazards if it determines that the licensee has abused the emergency provision by failing to make timely application for the amendment and thus itself creating the emergency. The regulation requires that a licensee requesting an emergency amendment explain why the emergency situation occurred and why the licensee could not avoid the situation. As explained below, an emergency amendment is needed to preclude an unnecessary plant shutdown, and Detroit Edison could not have reasonably avoided the situation or made timely application for an amendment.

Reason Emergency Situation Has Occurred

The emergency situation resulted from several unforeseen problems that occurred during this maintenance outage that was originally scheduled to be completed in 91 hours. Although the problems associated with the bearing replacement, the piston replacement and the output breaker have been resolved and repairs completed, the time required to complete troubleshooting and post maintenance testing associated with these problems is a major contributor to the current emergency situation for which a license amendment is being requested.

The remaining problem involves the unexpected EDG 12 overvoltage condition which was experienced on February 2, 2006 and again on February 4th. Troubleshooting, repair and retesting associated with this problem and the remaining post maintenance runs necessary to restore EDG 12 operability will likely exceed the seven days allowed by TS 3.8.1, Condition A and thus require that the unit be shutdown.

Detroit Edison has determined that the risk of extending the seven day allowed outage time by an additional seven days does not warrant subjecting the unit to a shutdown transient. Neither a routine nor an exigent amendment could be processed within the available time. Therefore, an emergency amendment is needed to preclude an unnecessary shutdown.

Reason the Situation Could Not Have Been Avoided

On January 30, 2006, at 0200 hours, EDG 12 was declared inoperable for a scheduled safety system outage, entering the seven day action statement of Technical Specification (TS) LCO 3.8.1, Condition A. During the outage, it was determined that a bearing and a piston needed to be replaced. Near the completion of the safety system outage, the following three unexpected conditions were experienced:

- February 2, 2006, 0949 hours: EDG 12 tripped on overvoltage during a startup for post-maintenance testing. This condition appeared to be resolved. February 3, 2006, 1046 hours: EDG 12 is started in auto voltage control, output breaker is closed. The overvoltage trip condition did not recur.
- February 3, 2006, 1154 hours: EDG 12 output breaker fails to open upon completion of a post-maintenance test run.
- February 4, 2006, 0641 hours: EDG 12 tripped on overvoltage during a startup for post-maintenance testing. This is a repeat of the February 2, 2006, trip condition.

The EDG 12 output breaker had been replaced with a refurbished breaker during the safety system outage. The refurbished EDG 12 output breaker was replaced with the original output breaker. Investigation has determined that the refurbished breaker installed in position 12EB-EB3, during this EDG 12 outage, had physical tolerance differences from the originally installed breaker.

The overvoltage failure is not considered to be due to a common cause. The most probable cause for the overvoltage was relaxation of the spring clip that holds the fuse in the voltage regulator sensing circuit. This is supported by the subsequent finding of intermittent discontinuity at one fuse terminal and previous use of the fuse/spring clip as a tagging point for the EDG.

The EDG 12 seven day LCO expires February 6, 2006, at 0200 hours.

Detroit Edison could not have reasonably foreseen exceeding the seven day Completion Time of TS LCO 3.8.1. The original EDG 12 safety system outage schedule was extended when routine maintenance inspections determined a bearing and a piston needed to be replaced. Replacement of the bearing and piston was beyond the planned scope of the safety system outage. The time required to replace the bearing and piston did not, by themselves, extend the completion time of the outage, but multiple runs for post-maintenance break-in and testing were required. This extended the outage, originally scheduled for 3 days and 19 hours, to 4 days and 11 hours. Additional time has been added to the outage due to the the unexpected conditions requiring EDG 12 output breaker replacement and correction of the EDG 12 output overvoltage trip condition.

When the overvoltage condition has been corrected, there remains approximately 25 hours of post-maintenance testing and surveillance testing prior to declaring EDG 12 operable.

Completion of repairs, post-maintenance testing, and surveillance testing to establish operability will not likely be completed prior to expiration of the seven day allowed outage time. Detroit Edison is requesting a one time extension of this seven day allowed outage time by an additional seven days to assure adequate time is available for completion of repairs, post-maintenance testing, and surveillance testing of the EDG. Detroit Edison has determined that the risk of the requested allowed outage time extension does not warrant subjecting the unit to a shutdown transient. This requested extension would be limited to the current period of EDG inoperability.

Detroit Edison therefore considers that the situation could not have been avoided and there is justification for requesting the proposed license amendment on an emergency basis.

4.0 TECHNICAL ANALYSIS:

The proposed amendment to allow a one-time extension of the allowed outage time for EDG 12 is based on the following considerations.

Risk from Proposed Allowed Outage Time Extension

A quantitative Probabilistic Risk Analysis (PRA) for the extended Fermi 2 EDG 12 allowed outage time was produced by comparing the quantified values for Core Damage Frequency (CDF) and Large Early Release Frequency (LERF) with EDG 12 out of service versus the baseline "with maintenance" results.

The evaluation determined that the risk associated with maintaining the unit at power for an additional 168 hours beyond the present TS allowed outage time with an EDG unavailable falls within the available regulatory guidance. Fermi has concluded that the one-time, single EDG TS allowed outage time change has only a small quantitative impact on plant risk (based upon the guidance provided in Regulatory Guide 1.174 and 1.177).

The evaluation was performed using the FermiV6 PRA model. The evaluation used the "with maintenance" PRA model (with nominal equipment unavailability) to compare the results with EDG 12 out-of-service and in-service. The values calculated for ICCDP and ICLERP were determined based on the additional seven-day EDG 12 outage. The numerical analysis is shown below:

$$\text{ICCDP} = (\text{CDF}_{\text{EDG12}} - \text{CDF}_{\text{base}}) * \Delta t$$

Where:

ICCDP = Incremental Conditional Core Damage Probability (per RG 1.177)

$\text{CDF}_{\text{EDG12}}$ = Core Damage Frequency with EDG 12 out-of service – $1.23\text{E-}5 \text{ yr}^{-1}$

CDF_{base} = Core Damage Frequency for the baseline quantification - $4.79\text{E-}6 \text{ yr}^{-1}$

Δt = Change in duration for the proposed one-time AOT extension – 7 days.

$$\text{ICCDP} = (1.23\text{E-}5 \text{ yr}^{-1} - 4.79\text{E-}6 \text{ yr}^{-1}) * (7 \text{ days} / (365 \text{ days/yr})) = 1.4\text{E-}7$$

And

$$\text{ICLERP} = (\text{LERF}_{\text{EDG12}} - \text{LERF}_{\text{base}}) * \Delta t$$

ICLERP = Incremental Conditional Core Damage Probability (per RG 1.177)

$\text{LERF}_{\text{EDG12}}$ = Large Early Release Frequency with EDG 12 out-of service – $7.07\text{E-}7 \text{ yr}^{-1}$

$\text{LERF}_{\text{base}}$ = Large Early Release Frequency for the baseline quantification – $3.27\text{E-}7 \text{ yr}^{-1}$

Δt = Change in duration for the proposed one-time AOT extension – 7 days.

$$\text{ICLERP} = (7.07\text{E-}7 \text{ yr}^{-1} - 3.27\text{E-}7 \text{ yr}^{-1}) * (7 \text{ days} / (365 \text{ days/yr})) = 7.3\text{E-}9$$

The above calculated values are well below the stringent thresholds required in RG 1.177 (an ICCDP of $5.0\text{E-}7$ and an ICLERP of $5.0\text{E-}8$) for a permanent Technical Specification change.

The analysis was completed with the following assumptions:

1. The baseline “with maintenance” PRA model, FermiV6 was utilized to perform the assessment. This model represents normal plant operation at full power and includes failure terms for all systems, as well as nominal initiating event frequencies.
2. EDG 12 will be returned to service 14 days from the initial LCO entry.
3. Equipment failure probabilities are not adjusted to credit restricting access to certain plant equipment required to guarantee the safe shutdown of the plant in the event of a transient.
4. No credit was taken for compensatory measures that may be taken to decrease operator or equipment failure rate.
5. No credit is taken for the temporary blackstart diesel generator, which allows CTGs 11-2, 11-3, and 11-4 as a source of electrical power in the event of a station blackout.
6. No credit is given for the recent periodic testing of the diesel generators (which would reduce their failure probabilities).
7. This condition does not increase the contribution to core damage due to other internal and external initiating events.
8. A truncation limit of $1\text{E-}10$ was utilized for all quantifications.

In addition to the above analysis, a sensitivity study was performed to account for any potential inclement weather that may occur during the duration of the extended AOT (by increasing the loss of offsite power initiating event frequency by a factor of 2.0). The results of this analysis show that the calculated values are still below the RG 1.177 criteria (ICCDP = $2.0\text{E-}7$ and ICLERP = $1.7\text{E-}8$).

Operation and Maintenance Restrictions

In accordance with MMR12, the site procedure for risk management, "Equipment Out of Service Risk Management," the plant is currently in a "LOW" risk status and is expected to remain in this category for the extended AOT period. The following equipment protections will be in effect until EDG 12 is restored to an Operable status:

- Elective maintenance will not be performed on EDGs 11, 13, and 14 or CTG 11-1.
- Elective maintenance will not be scheduled within the 120 kV and 345 kV switchyards that would challenge the offsite power connections or offsite power unavailability.
- Elective maintenance will not be performed on the opposite train Emergency Core Cooling System (ECCS) equipment.
- Elective maintenance will not be performed on equipment in the Standby Feedwater (SBFW) System.

While in the extended EDG 12 completion time period, overall plant risk will be managed by the existing Maintenance Rule (a)(4) program. This program evaluates increases in risk posed by potential combinations of equipment out-of-service and potential increases in initiating event frequency and requires that risk recommendations be implemented as appropriate for a given plant configuration.

Maintenance and testing during the allowed outage time extension will be rescheduled for Fermi 2 as warranted to minimize aggregate risk. This will specifically include:

- Work performed on safety significant systems and their applicable support systems will be reviewed and rescheduled as necessary based upon routine and emergent Maintenance Rule 10CFR65 (a)(4) evaluations.
- No work will be performed that could potentially jeopardize the availability of the remaining on site emergency power sources. This will be ensured by restricting and/or controlling access to this equipment via guidance provided in MOP05 (the site procedure for control of equipment).

The following actions will be taken to provide an increased assurance of grid stability:

- No test or maintenance activities that could reduce switchyard reliability will be performed.
- At four hour intervals, the projected grid voltage following postulated unit trip will be verified to indicate a stable grid. Assuring the grid conditions are expected to remain stable serves to reduce the grid as an initiator for loss of offsite power to the units.
- Fermi 2 will contact the system dispatcher to ensure that no short-term activities adversely affecting grid stability are planned or have transpired.

- Fermi 2 will confirm that the system dispatcher will notify the control room or Shift Manager in the event of severe weather, system degradation, or perturbations do occur so that an appropriate plant response can be determined.

Operations Briefings will be conducted on the use of CTG 11-1 and the utilization of CTG 11-2, CTG 11-3, or CTG 11-4 in conjunction with the auxiliary blackstart diesel to mitigate the consequences of a station blackout or loss of off-site power. These briefings will include review of the associated procedures.

Grid Reliability

The following statements from the December 2005 Fermi Grid Adequacy Study demonstrate the stability of the grid near the Fermi plant site.

This study was performed by International Transmission Company (ITC) at the request of DTE Energy. The results show that the Fermi 2 generator and the rest of the system will remain stable for all conditions studied. Fermi and all generators in the study area show a well damped stable response to all faults simulated. Under the conditions studied, the voltage at the Fermi 120kV and 345kV buses, as well as the critical system service 4.16kV buses SS64 and SS65, will be sufficient to prevent the initiation of a trip by the degraded grid relays. Therefore, the grid is capable of supplying the necessary offsite power if the Fermi 2 unit trips off line.

5.0 REGULATORY ANALYSIS:

5.1 No Significant Hazards Consideration

Detroit Edison has evaluated whether the proposed amendment involves a significant hazards consideration by addressing the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as described below:

- (1) The proposed change does not involve a significant increase in the probability or the consequences of any accident previously evaluated.

The proposed change affects the Completion Time for TS LCO 3.8.1, Required Action A.6. The proposed change allows a one-time extension of the current Completion Time for the inoperable EDG 12 from seven days to 14 days.

The proposed change does not affect the design of the EDGs, the operational characteristics or function of the EDGs, the interfaces between the EDGs and other plant systems, or the reliability of the EDGs. Required Actions and their associated Completion Times are not considered initiating conditions for any accident previously evaluated, nor are the EDGs considered initiators of any previously evaluated accidents. The EDGs are provided to mitigate the consequences of previously evaluated accidents, including a loss of offsite power. The consequences of previously evaluated accidents will not be significantly affected by the extended EDG Completion Time because a sufficient number of onsite AC power sources will continue to remain available to perform the accident mitigation functions associated with the EDGs, as assumed in the accident analyses. Thus the consequences of accidents previously evaluated are not affected by the proposed change in Completion Time

To fully evaluate the effect of the proposed EDG Completion Time extension, Probabilistic Risk Assessment (PRA) methods and a deterministic analysis were utilized. The results of the analysis show no significant increase in Core Damage Frequency (CDF) or Large Early Release Frequency (LERF). Therefore, the proposed change does not involve a significant increase in the probability or the consequences of any accident previously evaluated.

- (2) The proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a change in the design, configuration, or method of operation of the plant. The proposed change will not alter the manner in which equipment operation is initiated, nor will the functional demands on credited equipment be changed. The proposed change allows operation of the unit to continue while EDG 12 is repaired and retested. The proposed extension does not affect the interaction of EDG 12 with any system whose failure or malfunction can initiate an accident. As such, no new failure modes are being introduced. Therefore, this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) The proposed change will not involve a significant reduction in the margin of safety.

The proposed change does not alter the plant design, nor does it affect the assumptions contained in the safety analyses. Specifically, there are no changes being made to the EDG design, including instrument setpoints. The proposed change has been evaluated both deterministically, and using risk-informed methods. Based upon these evaluations, margins of safety ascribed to EDG availability and to plant risk have been determined to be not significantly reduced. The evaluation has concluded the following with respect to the proposed change:

Applicable regulatory requirements will continue to be met, adequate defense-in-depth will be maintained, sufficient safety margins will be maintained, and any increases in CDF and LERF are small and consistent with the NRC Safety Goal Policy Statement (Federal Register, Vol.51, p. 30028 (51 FR 30028), August 4, 1986, as interpreted by NRC Regulatory Guides 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and 1.177, "An Approach for Plant-Specific Risk-Informed Decision making: Technical Specifications"). Furthermore, increases in risk posed by potential combinations of equipment out of service during the proposed extended EDG Completion Time will be managed under a configuration risk management program consistent with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," paragraph (a)(4), and as required by Technical Requirements Manual TR 5.1.2.

The availability of offsite power coupled with the availability of the other EDGs and the use of on-line risk assessment tools provide adequate compensation for the potential small incremental increase in plant risk associated with the extended EDG Completion Time. The proposed extended EDG Completion Time in conjunction with the availability of the other EDGs, continues to provide adequate assurance of the capability to provide power to the engineered safety features (ESF) buses. Therefore, implementation of the proposed change will not involve a significant reduction in the margin of safety.

The evaluation provided above shows that the proposed change will not significantly increase the probability or the consequences of any accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in the margin of safety. Therefore, the proposed change meets the criteria of 10 CFR 50.92(c) and no significant hazard consideration is involved.

5.2 Applicable Regulatory Requirements / Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. Detroit Edison has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the Technical Specifications (TS), and does not affect conformance with any General Design Criterion (GDC) differently than described in the Safety Analysis Report (SAR).

6.0 ENVIRONMENTAL CONSIDERATION:

Detroit Edison has reviewed the proposed change against the criteria of 10 CFR 51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor does it significantly change the types or significantly increase the amounts of effluents that may be released offsite. The proposed change does not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed change meets the criteria provided in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement or an Environmental Assessment.

ENCLOSURE 2 to

NRC-06-0010

PROPOSED TECHNICAL SPECIFICATION CHANGE (MARK-UP)

INCLUDED PAGE:

License Conditions page 6

- (21) **The schedule for performing surveillance requirements (SRs) that are new or revised in Amendment No. 134 shall be as follows:**
- **For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.**
 - **For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.**
 - **For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.**
 - **For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.**
- (22) **DECo shall perform an integrated tracer gas test to measure Control Room inleakage using methods described in ASTM E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This test will be performed by March 31, 2005. Further periodic assessments and testing will be performed in accordance with the guidance provided in NRC Regulatory Guide 1.197, (May 2003) "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Section D, Implementation, using the six year cycle described. In accordance with the Regulatory Guide, a self assessment will be performed after three years and a periodic test after 6 years.**

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(23) The 7 day allowed outage time of Technical Specification 3.8.1 Condition "A", Required Action A.6, which was entered at January 30, 2006, at 0200 hours, may be extended one time by an additional 7 days to complete repair and testing of EDG 12.

ENCLOSURE 3 to

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- (21) The schedule for performing surveillance requirements (SRs) that are new or revised in Amendment No. 134 shall be as follows:
- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
 - For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
 - For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
 - For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.
- (22) DECo shall perform an integrated tracer gas test to measure Control Room inleakage using methods described in ASTM E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This test will be performed by March 31, 2005. Further periodic assessments and testing will be performed in accordance with the guidance provided in NRC Regulatory Guide 1.197, (May 2003) "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Section D, Implementation, using the six year cycle described. In accordance with the Regulatory Guide, a self assessment will be performed after three years and a periodic test after 6 years.
- (23) The 7 day allowed outage time of Technical Specification 3.8.1 Condition "A", Required Action A.6, which was entered at January 30, 2006, at 0200 hours, may be extended one time by an additional 7 days to complete repair and testing of EDG 12.

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