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Detroit Edison

A DTE Energy Company



10 CFR 50.90

June 12, 2007
NRC-07-0030

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

Reference: Fermi 2
Docket No. 50-341
License No. NPF-43

Subject: Application for Technical Specification Change (TSTF-477) to
Add an Action Statement for Two Inoperable Control Center
Air Conditioning Subsystems to Technical Specification 3.7.4
Using the Consolidated Line Item Improvement Process

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Detroit Edison is submitting a request for an amendment to the Technical Specifications (TS) for Fermi 2.

The proposed amendment would modify the TS by adding an action statement for two inoperable control center Air Conditioning (AC) subsystems to the plant specific TS 3.7.4.

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS pages marked up to show the proposed change. Enclosure 3 provides revised (clean) TS pages. Enclosure 4 provides the existing TS Bases pages marked up to show the proposed corresponding change in accordance with 10 CFR 50.36(a).

Detroit Edison requests approval of the proposed License Amendment by November 30, 2007, with the amendment being implemented within 60 days thereafter.

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

If you have any questions or require additional information, please contact Mr. Ronald W. Gaston, Manager, Nuclear Licensing at (734) 586-5197.

Sincerely,

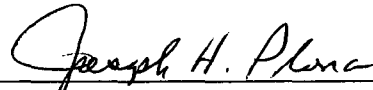
A handwritten signature in cursive script, appearing to read "Joseph Plena".

Enclosures:

1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Marked-up Technical Specification Bases Changes (for information only)

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission


I, Joseph H. Plona, 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.



JOSEPH H. PLONA
Site Vice President – Nuclear Generation

On this 12th day of June, 2007 before me personally appeared Joseph H. Plona, being first duly sworn and says that he executed the foregoing as his free act and deed.

STACY CAKES
NOTARY PUBLIC, STATE OF MI
COUNTY OF MONROE
MY COMMISSION EXPIRES JUL 23, 2012
ACTING IN COUNTY OF MONROE, MI



Notary Public

**ENCLOSURE 1 TO
NRC-07-0030**

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment would modify technical specifications by adding an Action Statement to the Limiting Condition for Operation (LCO). The new Action Statement allows a finite time to restore one control center Air Conditioning (AC) subsystem to operable status and requires verification that control center temperature remains <90° F every 4 hours.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) TSTF-477, Revision 3. The availability of this TS improvement was published in the Federal Register on March 26, 2007 (Reference 1) as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-477 and Published Safety Evaluation

Detroit Edison has reviewed TSTF-477 (Reference 2), and the NRC model safety evaluation (SE) (Reference 3) as part of the CLIIP. Detroit Edison has concluded that the information in TSTF-477, as well as the SE prepared by the NRC staff are applicable to Fermi 2 and justify this amendment for the incorporation of the changes to the Fermi 2 TS.

2.2 Optional Changes and Variations

Detroit Edison is not proposing any technical variations or deviations from the TS changes described in the TSTF-477, Revision 3 or the NRC staff's model safety evaluation dated December 18, 2006 (Reference 3).

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Detroit Edison has reviewed the proposed no significant hazards consideration determination (NSHC) published in the Federal Register as part of the CLIIP (Reference 3). Detroit Edison has concluded that the proposed NSHC presented in the Federal Register notice is applicable to Fermi 2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on March 26, 2007 (Reference 1) for this TS improvement, plant-specific verifications were performed as follows:

Consistent with TSTF-477, Detroit Edison is proposing TS Bases changes which provide guidance and details on how to implement the new requirements. Detroit Edison has a TS Bases Control Program consistent with Section 5.5 of the Standard Technical Specifications (STS).

4.0 ENVIRONMENTAL EVALUATION

This amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR part 20. The NRC staff has determined that the amendment adopting TSTF-477, Revision 3, involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that TSTF-477, Revision 3, involves no significant hazards considerations, and there has been no public comment on the finding in Federal Register Notice 71 FR 75774, December 18, 2006 (Reference 3). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 REFERENCES

- 1) Notice of Availability, Federal Register Notice 72 FR 14143, dated March 26, 2007.
- 2) TSTF-477, Revision 3, "Adding an Action Statement for Two Inoperable Control Room Air Conditioning Subsystems."
- 3) NRC Model Safety Evaluation Report, Federal Register Notice 71 FR 75774, dated December 18, 2006.

**ENCLOSURE 2 TO
NRC-07-0030**

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Pages 3.7-11, 3.7-12 and 3.7-13

3.7 PLANT SYSTEMS

3.7.4 Control Center Air Conditioning (AC) System

LCO 3.7.4 Two control center AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.
During movement of recently irradiated fuel assemblies in the secondary containment,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control center AC subsystem inoperable.	A.1 Restore control center AC subsystem to OPERABLE status.	30 days
B. C. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3.	C. B. 1 Be in MODE 3.	12 hours
	AND C. B. 2 Be in MODE 4.	36 hours

(continued)

B. Two control center AC Subsystems inoperable.	B.1 Verify control center area temperature < 90°F.	Once per 4 hours
	AND B.2 Restore one control center AC subsystem to OPERABLE status.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>✓ D Required Action and associated Completion Time of Condition A not met during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>✓ D 1 Place OPERABLE control center AC subsystem in operation.</p> <p>OR</p> <p>✓ D 2.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p> <p>AND</p> <p>✓ D 2.2 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p>D Two control center AC subsystems inoperable in MODE 1, 2, or 3.</p>	<p>D.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>E. Two control center AC subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.</p> <p><i>Required Action and associated Completion Time of Condition B not met</i></p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>E.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>E.2 Initiate actions to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.4.1 Verify the control room air temperature is $\leq 95^{\circ}\text{F}$.</p>	<p>12 hours</p>

**ENCLOSURE 3 TO
NRC-07-0030**

PROPOSED TECHNICAL SPECIFICATIONS PAGES

Pages 3.7-11, 3.7-12 and 3.7-13

3.7 PLANT SYSTEMS

3.7.4 Control Center Air Conditioning (AC) System

LCO 3.7.4 Two control center AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.
During movement of recently irradiated fuel assemblies in the secondary containment,

During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control center AC subsystem inoperable.	A.1 Restore control center AC subsystem to OPERABLE status.	30 days
B. Two control center AC subsystems inoperable.	B.1 Verify control center area temperature <90°F.	Once per 4 hours
	<u>AND</u> B.2 Restore one control center AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable -----</p>	
	<p>D.1 Place OPERABLE control center AC subsystem in operation.</p>	<p>Immediately</p>
	<p><u>OR</u></p> <p>D.2.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>D.2.2 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

(continued)

**ENCLOSURE 4 TO
NRC-07-0030**

PROPOSED CHANGES TO TECHNICAL SPECIFICATION BASES

**Pages B 3.7.4-3, B 3.7.4-4 and B 3.7.4-5
(plus Insert 1, 1 page)**

BASES

APPLICABILITY (continued)

- a. During operations with a potential for draining the reactor vessel (OPDRVs); and
- b. During movement of recently irradiated fuel assemblies in the secondary containment. Due to radioactive decay, the Control Room AC System is only required to be OPERABLE during fuel handling involving recently irradiated fuel. "Recently irradiated fuel" is fuel that has occupied part of a critical reactor core within the previous 6.3 days provided that it is verified that the limits in Footnote 11 of Regulatory Guide 1.183 are not exceeded. Otherwise, "recently irradiated fuel" is fuel that has occupied part of a critical reactor core within the previous 37 days. Handling new (non-irradiated) fuel bundles over the open reactor core or the spent fuel pool is subject to the same requirements of handling recently irradiated fuel, as long as any fuel in the core or fuel pool is recently irradiated.

ACTIONS

A.1

With one control center AC subsystem inoperable, the inoperable control center AC subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE control center AC subsystem is adequate to perform the control center air conditioning function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in loss of the control center air conditioning function. The 30 day Completion Time is based on the low probability of an event occurring requiring control room isolation, the consideration that the remaining subsystem can provide the required protection, and the availability of alternate safety and nonsafety cooling methods.

INSERT 1

→ ^CB.1 and ^CB.2

(S)

In MODE 1, 2, or 3, if the inoperable control center AC subsystem cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are

BASES

ACTIONS (continued)

reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

~~D~~ ~~C.1, C.2.1 and C.2.2~~

^D
The Required Actions of Condition ~~C~~ are modified by a Note indicating that LCO 3.0.3 does not apply. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of recently irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs, if Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE control center AC subsystem may be placed immediately in operation. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

^D
An alternative to Required Action ~~C.1~~ is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, movement of recently irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

~~D.1~~

~~If both control center AC subsystems are inoperable in MODE 1, 2, or 3, the Control Center AC System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.~~

BASES

ACTIONS (continued)

E.1 and E.2

The Required Actions of Condition E are modified by a Note indicating that LCO 3.0.3 does not apply. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of recently irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.

if Required Actions B.1 and B.2 cannot be met within the required Completion Times

During movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs, ~~with two control center AC subsystems inoperable~~, action must be taken *to* immediately ~~to~~ suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, handling of recently irradiated fuel in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

SURVEILLANCE
REQUIREMENTS

SR 3.7.4.1

This SR verifies that the heat removal capability of the system is sufficient to remove the control room heat load. The SR consists of a verification of the control room temperature. The 12 hour Frequency is appropriate since significant degradation of the Control Center AC System is not expected over this time period.

REFERENCES

1. UFSAR, Section 6.4.
2. UFSAR, Section 9.4.1.

INSERT 1

B.1 and B.2

If both control center AC subsystems are inoperable, the Control Center AC System may not be capable of performing its intended function. Therefore, the control center area temperature is required to be monitored to ensure that temperature is being maintained low enough that equipment in the control center is not adversely affected. With the control center temperature being maintained within the temperature limit, 72 hours is allowed to restore a Control Center AC subsystem to OPERABLE status. This Completion Time is reasonable considering that the control center temperature is being maintained within the temperature limit and the low probability of an event occurring requiring control center isolation.