Joseph H. Plona
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Detroit Edison
A DTE Energy Company

10 CFR 50.90

September 11, 2007
NRC-07-0047

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

References: 1) Fermi 2
Docket No. 50-341
License No. NPF-43

2) Detroit Edison Letter to NRC, "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," NRC-07-0030, dated June 12, 2007

Subject: Transmittal of Revised Technical Specifications (TS) Pages for Use with the Application to Add an Action Statement for Two Inoperable Control Center Air Conditioning Subsystems in TS 3.7.4

In Reference 2, Detroit Edison requested NRC approval of a proposed change to Technical Specification (TS) 3.7.4, "Control Center Air Conditioning (AC) System." Specifically, the proposed change would modify TS 3.7.4 by adding an Action Statement to the Limiting Condition for Operation (LCO). The new Action Statement allows 72 hours to restore one Control Center AC subsystem to operable status and requires verification that control room temperature remains below 90 degrees Fahrenheit every 4 hours.

The proposed change is consistent with the NRC-approved Industry / Technical Specification Task Force (TSTF)–477, Revision 3. The availability of this TS improvement was published in the Federal Register on March 26, 2007 as part of the consolidated line item improvement process (CLIIP).

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LLR

In a conference call with NRC on August 3, 2007, the NRC staff raised a question regarding the terminology used in the new Action Statement. Specifically, the staff questioned the use of the term "control center" in the proposed Required Action B.1.

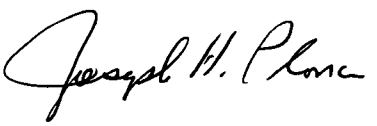
TSTF-477, Revision 3, as approved by the NRC uses the term "control room" in Required Action B.1, and does not include the term in brackets. Therefore, the proposed Required Action B.1 should use the term "control room."

Updated TS and TS Bases pages that include this revision are provided in Enclosures to this letter. Enclosure 1 provides updated existing TS pages marked up to show the proposed change. Enclosure 2 provides updated revised (clean) TS pages. Enclosure 3 provides updated existing TS Bases pages marked up to show the proposed corresponding change. These TS and TS Bases pages replace the ones provided in Reference 2.

In accordance with 10 CFR 50.91, a copy of this letter, 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,



Enclosures:

1. Proposed Technical Specification Changes
2. Revised Technical Specification Pages
3. 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

JOSEPH H. PLONA
Site Vice President - Nuclear Generation

On this eleventh day of September, 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.

CYNTHIA A. WISNIEWSKI
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Mar 30, 2013
ACTING IN COUNTY OF Monroe

Cynthia A Wisniewski

Notary Public

ENCLOSURE 1 TO
NRC-07-0047

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. or B	~~B~~ C.1 Be in MODE 3. AND ~~B~~ C.2 Be in MODE 4.	12 hours 36 hours

(continued)

B. Two control center AC Subsystems inoperable.	B.1	Verify control room 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
C. 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.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	C.1 D. Place OPERABLE control center AC subsystem in operation.	Immediately
	OR	
	C.2.1 D. Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	C.2.2 D. Initiate action to suspend OPDRVs.	Immediately
D. Two control center AC subsystems inoperable in MODE 1, 2, or 3.	D.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. ~~Two control center AC subsystems inoperable~~ during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	E.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	E.2 Initiate actions to suspend OPDRVs.	Immediately

Required Action and associated Completion Time of Condition B not met

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify the control room air temperature is ≤ 95°F.	12 hours

ENCLOSURE 2 TO
NRC-07-0047

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 room area temperature <90°F. AND B.2 Restore one control center AC subsystem to OPERABLE status.	Once per 4 hours 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. AND C.2 Be in MODE 4.	12 hours 36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
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.	----------NOTE---------- LCO 3.0.3 is not applicable ----------	
	D.1 Place OPERABLE control center AC subsystem in operation.	Immediately
	OR	
	D.2.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	D.2.2 Initiate action to suspend OPDRVs.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition B not met during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable ---------- E.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment. AND E.2 Initiate actions to suspend OPDRVs.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify the control room air temperature is ≤ 95°F.	12 hours

ENCLOSURE 3 TO
NRC-07-0047

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 →

C

B.1 and B.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

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.

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 immediately ~~to~~ 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 room area temperature is required to be monitored to ensure that temperature is being maintained low enough that equipment in the control room is not adversely affected. With the control room 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 room temperature is being maintained within the temperature limit and the low probability of an event occurring requiring control room isolation.