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DTE Energy



10 CFR 50.90

September 21, 2007
NRC-07-0051

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

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Detroit Edison Letter to NRC, "Proposed License Amendment to Delete the Note Associated with the Performance of Channel Calibration for Primary Containment High Range Radiation Monitor in Technical Specification 3.3.3.1 Surveillance Requirement," NRC-07-0036, dated July 12, 2007

Subject: Submittal of Revised No Significant Hazards Consideration for the Proposed License Amendment to Delete the Note Associated with the Performance of Channel Calibration for Primary Containment High Range Radiation Monitor in Technical Specification 3.3.3.1 Surveillance Requirement

In Reference 2, Detroit Edison requested NRC approval of a proposed license amendment to Technical Specifications (TS) 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation." Specifically, the proposed amendment would revise Surveillance Requirement (SR) 3.3.3.1.2 by deleting the note which excludes radiation detectors from calibration requirements.

In a conference call with NRC on September 7, 2007, the NRC project manager requested a revision to the No Significant Hazards Consideration for the proposed license amendment. Specifically, the project manager requested additional substantiation to address the effect of the change on the increase in the consequences of an accident previously evaluated, and the possibility of creating a new or different kind of accident from any accident previously evaluated.

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Revision to the No Significant Hazards Consideration for the proposed license amendment is provided in the Enclosure to this letter. This enclosure replaces the No Significant Hazards Consideration provided in Reference 2.

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

Should you have any questions or require additional information, please contact Mr. Ronald W. Gaston of my staff at (734) 586-5197.

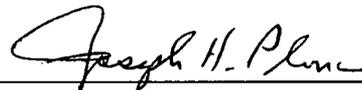
Sincerely,

A handwritten signature in black ink, appearing to read "Joseph H. Plone". The signature is written in a cursive style with a large initial "J".

Enclosure: Revised No Significant Hazards Consideration

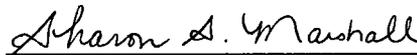
cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

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 21st 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.



Notary Public

SHARON S. MARSHALL
NOTARY PUBLIC, STATE OF MI
COUNTY OF MONROE
MY COMMISSION EXPIRES JUN 14, 2018
ACTING IN COUNTY OF Monroe



**ENCLOSURE TO
NRC-07-0051**

REVISED NO SIGNIFICANT HAZARDS CONSIDERATION

No Significant Hazards Consideration

In accordance with 10 CFR 50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards consideration. The proposed change to delete the note excluding radiation detectors from the channel calibration requirement in Technical Specification (TS) 3.3.3.1 Surveillance Requirement (SR) 3.3.3.1.2 does not involve a significant hazards consideration for the following reasons:

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

Primary Containment Radiation Monitors are part of the post accident monitoring instrumentation. Deleting the note excluding radiation detectors from the channel calibration requirement in TS 3.3.3.1 surveillance requirement does not adversely affect any of the parameters in accident analyses. Revising the detectors calibration requirement does not affect the probability or consequences of previously evaluated accidents. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Deleting the note excluding the radiation detectors from channel calibration requirement in SR 3.3.3.1.2 restores the calibration of the primary containment high range radiation monitors to the requirements in NUREG-0737, Table II.F.1-3. The revision of the primary containment high range radiation monitor calibration provides an improved assurance of the accuracy and function of the monitor during and following an accident. These monitors provide indication of high-range radiation and are primarily used by emergency response personnel for evaluating protective action recommendations. These monitors are provided for indication only and do not initiate any automatic action. Removing the exclusion of radiation detectors from the channel calibration requirement in SR 3.3.3.1.2 cannot create a new or different kind of accident from previously evaluated accidents. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in the margin of safety.

This proposed license amendment involves a change in the channel calibration surveillance of primary containment high range radiation monitor in TS 3.3.3.1. The surveillance frequency is unchanged. The change in the high range radiation monitor channel calibration only removes the exclusion of the detectors from SR 3.3.3.1.2. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Detroit Edison has determined that the proposed license amendment does not involve a significant hazards consideration.