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DTE Energy



10 CFR 50.54(q)

February 5, 2008
NRC-08-0013

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, "Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)," NRC-05-0052, dated September 6, 2005
 - 3) Detroit Edison Letter to NRC, "Withdrawal of Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)," NRC-06-0056, dated July 21, 2006
 - 4) NRC letter dated August 31, 2006, "Fermi 2 – Withdrawal of Proposed Changes to the Radiological Emergency Response Plan (TAC No. MC8351)"
 - 5) Detroit Edison Letter to NRC, "Submittal of Proposed Revision to the Fermi 2 Radiological Emergency Response Preparedness Plan (RERP Plan)," NRC-07-0009, dated May 14, 2007
 - 6) NRC letter dated January 7, "Fermi 2 – Request for Additional Information Related to Proposed Revision to the Radiological Emergency Response Preparedness Plan (TAC No. MD5611)"

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Subject: Response to NRC Request for Additional Information
Regarding the Proposed Revision to the Fermi 2
Radiological Emergency Response Preparedness Plan (RERP Plan)

In Reference 5 Detroit Edison requested review and approval of a proposed change to the Fermi 2 Radiological Emergency Response Preparedness (RERP) Plan.

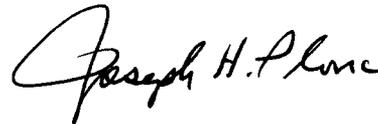
On January 7, 2008, (Reference 6) the NRC requested additional information regarding the proposed revision.

Based on information developed while responding to the requested information, Detroit Edison is withdrawing our request for approval of Proposal 3. That proposal revised the 60-minute responders to delete one Support Engineer. Approval is requested for the remaining changes: to eliminate the Station Nuclear Engineer position, the second Chemistry Technician, the EOF Coordinator, the QA Advisor, from the Emergency Response Organization (ERO).

The enclosure to this letter provides responses to the NRC questions and supports the above withdrawal.

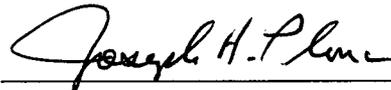
Should you have any questions or require additional information, please contact Mr. Ronald W. Gaston at (734) 586-5197.

Sincerely,



cc: NRC Project Manager
Reactor Projects Chief, Branch 4, Region III
NRC Resident Office
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
Vice President, Nuclear Generation

On this 5th day of February, 2008 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, MI



Notary Public

**ENCLOSURE
TO
NRC-08-0013**

**RESPONSES TO
REQUEST FOR
ADDITIONAL INFORMATION**

1. *Proposal 1 would eliminate the requirement for the Station Nuclear Engineer (previously the Reactor Engineer) from reporting to the site within 30 minutes. Part of the justification for this proposed change states "Since the original approval of the RERP Plan, training has greatly improved the Shift Technical Advisor's (STA) knowledge and capabilities. The STA's expertise allows for the Station Nuclear Engineer/Reactor Engineer requirement to be eliminated from the ERO [Emergency Response Organization] staffing." (1) What are the training qualification requirements for the Station Nuclear Engineer/Reactor Engineer position and (2) how do these requirements compare to those of the STA position?*

- (1) The Station Nuclear Engineer's responsibilities/requirements listed in the RERP Plan, revision 32, Table B-2 are as follows:

- Analyze conditions affecting core safety
- Advise the Emergency Director/Shift Manager on all matters relating to core safety

The Station Nuclear Engineer (SNE) training program is part of the accredited Engineering Support Training program, described in ACAD 98-004 revision 1, "Guidelines for Training and Qualification of Engineering Personnel".

SNE position specific training is described in QG-ES-070-0301, which describes aspects of the responsibilities/requirements listed in the RERP Plan Table B-2.

- (2) STA training program is described in INPO 90-003, "Guidelines for the Training and Qualification of Shift Technical Advisors." INPO 90-003 section 9, Plant Operations, describes the STA responsibility to perform evaluations for critical safety functions during normal, abnormal, and emergency operations. INPO 90-003 section 11, Mitigating Core Damage, describes the STA responsibility to analyze, respond, and mitigate core damage accidents and advise the operating crew accordingly.

The SNE responsibilities/requirements are further discussed in "STA Duties and Responsibilities" training material found in LP-OP-902-0101 and the corresponding student text.

Therefore, the site training and qualification program ensures that the STA is qualified to perform those duties required of the SNE per the RERP Plan, Table B-2.

2. *Proposal 1 states in part that "The STA can adequately respond to any accident to assure reactor safety until relieved by the Engineering Staff in the TSC [Technical Support Center]". By eliminating the 30-minute reporting requirement for the SNE, TSC Engineering Staff may not be available for up to 60 minutes following an Alert or higher declaration. (1) What tasks are performed by the STA position during an emergency in addition to those previously performed by the SNE/RE? (2) What was the basis for determining that the STA would be able to effectively perform these tasks for any accident until relieved by the TSC Engineering Staff?*

- (1) The tasks performed by the SNE do not represent additional duties for the STA. The Station Technical Advisor responsibilities/requirements listed in the RERP Plan, revision 32, Table B-2 include:
- Advise the Emergency Director on plant technical matters
 - Thermal/hydraulic issues
 - Reactor Engineering
 - Analysis related to safe operation of the plant

The Station Nuclear Engineer responsibilities/requirements listed in the RERP Plan, revision 32, Table B-2 include:

- Analyze conditions affecting core safety
- Advise the Emergency Director/Shift Manager on all matters relating to core safety

- (2) As described in the response to question 1, the SNE duties/responsibilities are also part of the STA duties/responsibilities and do not represent additional duties for the STA during an emergency. The elimination of the SNE from augmented personnel retains the technical support function already performed by the STA for an additional 30 minutes.

Additionally, the responsibility of performing dose assessment that was originally assigned to the STA during an accident or emergency in RERP Plan revision 3A was assigned to the on-shift Chemistry Technician in RERP Plan revision 32. This relieved the STA of the dose assessment function.

3. *Proposal 3 states that one of the two Support Engineers would be eliminated as a 60-minute responder. However, in the Fermi submittal identified as NRC 07-0009, Enclosure 1, Table 2, two Support Engineers are shown as of revision 3A of the Fermi RERP and only one Support Engineer is shown in revision 32, indicating that this change was made in a previous revision to the emergency plan. Additional information is requested to clarify when this change occurred and the basis for the change at the time it was originally made.*

In the last NRC approved Plan, Revision 3A, the Plan required two Support Engineers and a Nuclear Safety Advisor (NSA). The Support Engineers could be

from any of the following disciplines; electrical, mechanical, I&C, or Thermal/Hydraulic. In March of 1988, Table B-1 was revised to require the Technical Engineer or Nuclear Safety Advisor (NSA) and one Engineer for the 60 minute augmented staff.

The basis for this change was to align the number of responding personnel to the guidance provided in Table B-1 of NUREG 0654, specifically two Support Engineers in 60 minutes. Since the change was consistent with the guidance, NRC approval was not requested.

In 2005, based on a review of Regulatory Information Summary (RIS) 2005-02, it was determined that NRC approval of the change was appropriate. Approval of this change was subsequently requested (Reference 2), and as stated in Reference 4, would have been approved had it not been withdrawn (Reference 3).

4. *Proposal 3 would provide for one Nuclear Safety Advisor (or Technical Engineer) and one Support Engineer to be available in the TSC within 60 minutes.*
(1) Describe in more detail how typical technical support functions, such as electrical and mechanical engineering support, are addressed by TSC staffing under the current Fermi RERP. (2) How would these same technical support functions be addressed under proposal 3?

- (1) Currently, when activated, the Nuclear Safety Advisor (or Technical Engineer) will arrive in the TSC and take action to determine plant status and equipment availability if not already known. Along with a Support Engineer, the NSA (or Technical Engineer) will analyze plant conditions using primarily field team reports and the IPCS computers. This would include determining electrical, mechanical, instrument and controls, or thermal/hydraulic concerns.

Each Support Engineer is a degreed engineer and as such receives training in basic engineering fundamentals. They also attend the INPO Accredited Engineering Support Personnel Training Program which meets the requirements of ACAD 98-004, revision 1. As part of this training program, engineers receive Fundamental Training consisting of: Electrical Science which including fundamentals, basic electronics and principles of operation; Mechanical Engineering principles and fundamentals; Civil Engineering fundamentals; and Properties of Reactor Plant Materials; Heat Transfer and Fluid Flow; Chemistry; Process Control Systems; Core Protection; and drawings and print reading.

Therefore, each engineer, regardless of specific discipline, can analyze any engineering concern, including electrical or mechanical, during an emergency.

- (2) Based on the above, there are no changes to how Technical Support functions are addressed under proposal 3.

As described in NRC 07-0009, the advances in technology have improved the capabilities of the ERO. Better technical analysis is performed on-shift and by responding members of the ERO. Therefore, one support engineer, in addition to the NSA or Technical Engineer is sufficient to facilitate the task of technical support and analysis.

5. *Proposal 4 would eliminate the Emergency Operations Facility (EOF) Coordinator position, which is not an augmented position. However in the discussion of proposal 4 it states the EOF Coordinator position was eliminated in March 1988. Additional information is requested to clarify the basis for the change at the time it was originally made and why NRC approval is being requested or is necessary now.*

The change was made in 1988 was to align the RERP Plan Table B-1 with the guidance provided by NUREG 0654, Table B-1. Practice drills performed up to the time of the change indicated that the Emergency Coordinator duties were performed by other members of the EOF Staff, particularly minimum staffing personnel. The EOF Coordinator position had become a redundant position and all other peripheral administrative duties were incorporated into the EOF Administrator position.

Based on a re-evaluation of this proposed change under 10 CFR 50.54(q), this change does not require prior NRC approval. Therefore, the request for approval of this change is being withdrawn.

6. *Proposal 4 states the "[T]he EOF Coordinator was identified as the person who directed activities in the EOF" and that this function is actually performed by the Emergency Officer. The Fermi RERP, Table B-2, Revision 3A, indicates that the EOF Coordinator performed other functions as well, including notifying government emergency response agencies and recommending protective measures to off-site emergency response organizations based on dose assessment. Additional information is requested to clarify how other tasks that were performed by the EOF Coordinator have been addressed.*

Emergency notifications to government emergency response agencies are performed by the Communicator assigned to the EOF in accordance with implementing procedure EP-290. The Emergency Officer is responsible to approve any release of information offsite including emergency notifications.

Protective action recommendations based on dose assessment (or plant status) are developed by the Radiation Protection Coordinator and approved by the Emergency Officer per EP-545. This is identified in Table B-2 of the current revision of the RERP Plan.

This change does not require prior NRC approval and the request is being withdrawn, as stated above.