March 18, 2010

Mr. Jack M. Davis
Senior Vice President and Chief Nuclear Officer
Detroit Edison Company
Fermi 2 – 210 NOC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 26 RELATED TO THE SRP SECTIONS 12.2.2, 13.6.1, 14.3.2, 14.3.12 and 17.5 FOR THE FERMI 3 COMBINED LICENSE APPLICATION

Dear Mr. Davis:

By letter dated September 18, 2008, Detroit Edison Company (Detroit Edison) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, you are requested to respond within 45 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, I can be reached at 301-415-8148 or by e-mail at jerry.hale@nrc.gov.

Sincerely,

/RA Chandu Patel for/

Jerry Hale, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 052-033

eRAI Tracking Nos. 4338, 4408, 4410, 4411, 4412, 4486, 4487, 4489, 4493

Enclosure:
Request for Additional Information

March 18, 2010

Mr. Jack M. Davis
Senior Vice President and Chief Nuclear Officer
Detroit Edison Company
Fermi 2 – 210 NOC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 26 RELATED TO THE SRP SECTIONS 12.2.2, 13.6.1, 14.3.2, 14.3.12 and 17.5 FOR THE FERMI 3 COMBINED LICENSE APPLICATION

Dear Mr. Smith:

By letter dated September 18, 2008, Detroit Edison Company (Detroit Edison) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, you are requested to respond within 45 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, I can be reached at 301-415-8148 or by e-mail at jerry.hale@nrc.gov.

Sincerely,

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Jerry Hale, Project Manager
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Office of New Reactors

Docket Nos. 052-033
eRAI Tracking Nos. 4338, 4408, 4410, 4411, 4412, 4486, 4487, 4489, 4493
Enclosure:
Request for Additional Information
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ADAMS Accession No. ML100770169 NRO-002

OFFICE	NRO/CQVB	NRO/CHPB	NSIR/RSRLB	OGC	NGE1/LPM
NAME	R.Rasmussen	E.Roach	D.Huyck	M. Carpentier	CPatel
DATE	2/22/10	3/12/10	3/12/10	3/2/10	3/18/10

***Approval captured electronically in the electronic RAI system.**

OFFICIAL RECORD COPY

Request for Additional Information No. 4338, Revision 0

Fermi Unit 3
Detroit Edison
Docket No. 52-033
SRP Section: 14.03.02 - Structural and Systems Engineering
Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: FSAR Section 14.3.2

14.03.02-2

Section 2.4.1, "ITAAC FOR BACKFILL UNDER CATEGORY I STRUCTURES," of Part 10 states that: “Not applicable since no compactable backfill will be placed under Fermi 3 Category I structures.” Confirm that the above statement also applies to the supporting foundation medium for the FWSC structures. If not, discuss key elements of ITAAC that will be applied to the compactable backfill fill medium.

Request for Additional Information No. 4408, Revision 1

Fermi Unit 3
Detroit Edison
Docket No. 52-033
SRP Section: 17.5 - Quality Assurance Program Description
Design Certification, Early Site Permit and New License Applicants
Application Section: 17.5 and Quality Assurance Program Description (Appendix 17AA)

17.5-16

10 CFR 52.79(a) requires the applicant FSAR to contain sufficient depth of information to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license. 10 CFR 52.79(a)(25) requires the applicant to provide a QA program consistent with Appendix B to 10 CFR Part 50 for design, fabrication and construction activities.

Appendix B establishes quality assurance requirements for the design, manufacture, construction, and operation of the structures, systems, and components of the facility. The pertinent requirements of this appendix apply to all activities affecting the safety-related functions of the structures, systems, and components to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

Regulatory Guide 1.206 section C.I.17.5.3 states that the FSAR should 1) describe how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations, 2) should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented, 3) identify major work interfaces for activities affecting quality, and 4) describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Attachment 3 to NRC 3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states during the Project Initiation Phase (January 2007 to November 2007) Black & Veatch (B&V) was selected as the COLA contractor and COLA development commenced under the B&V 10 CFR 50 Appendix B/NQA-1 QA program. Additionally, Detroit Edison secured the services of an OE (B&V, Ann Arbor) to support owner-related activities, including COLA contractor oversight.

Later, during the Development, Receipt, Review and Acceptance of COLA Work Product Phase (November 2007 to September 2008), Detroit Edison began to develop the necessary staffing to support the receipt, acceptance review, submittal, NRC review, and concurrent maintenance of the COLA. Detroit Edison then drafted the *Nuclear Development Quality Assurance Program Document* (ND QAPD) and implementing procedures for those elements of the ND QAPD associated with the activities planned to be performed by Detroit Edison at the time (e.g., review of B&V COLA work product). The ND QAPD was approved for use in February 2008 and remained in effect until the Fermi 3 COLA was filed in September 2008, and the Fermi 3 QAPD superseded it.

In Attachment 1 to NRC3-09-0041, "Detroit Edison Reply to a Notice of Violation 05200033/2009-201, 02, and 03," dated November 9, 2009, Detroit Edison asserts that the requirements of Appendix B to 10 CFR Part 50 were not applicable to Detroit Edison prior to September 18, 2008, because Detroit Edison was not yet an applicant. Detroit Edison also contends that, prior to becoming an applicant, a QA program was established by contractually delegating the work of establishing and executing the QA program to the COLA contractor.

In summary, Detroit Edison has stated that prior to the Fermi 3 COLA filing:

1) the FSAR required Appendix B compliant QA program was contractually established with B&V for safety-related activities,

2) Appendix B requirements were not applicable to Detroit Edison, and

3) multiple QAPDs were utilized for pre-COL activities (both Detroit Edison and B&V)

Sufficient detail has not been provided in the Fermi 3 FSAR to enable the NRC staff to reach a final conclusion on whether all Fermi 3 project safety-related activities completed prior to the COL application date were consistent with the requirements of Appendix B to 10 CFR Part 50.

Please provide a detailed summary describing how all Fermi 3 safety-related activities completed or in process prior to September 18, 2008, were consistent with the requirements of Appendix B. The summary must include more detailed information than was presented in the RAI 17.5-3 response.

Included as part of the summary, please provide the following information presented in the form of a table: 1) list of safety-related activities and safety-related COL application sections, 2) dates of the activity or section creation, 3) contracting entity conducting the activity / section creation and governing QAPD, 4) QA organization responsible for oversight of the activity / section creation, 5) dates and type of any specific contractor QA oversight activities (i.e., surveillance, document review, etc), 6) contractor approval date, 7) dates of Detroit Edison review and approval, and 8) dates and type of any specific Detroit Edison QA oversight activities (i.e., surveillance, document review, etc). If documented evidence of information presented in the

table or the summary is not available for future inspection, please note within the table or summary.

Note: This RAI is supplemental to RAI 17.5-3 and 17.5-4 included in NRC RAI Letter No. 10, dated August 12, 2009.

Request for Additional Information Information No. 4410, Revision 1

17.5-17

10 CFR 52.79(a)(25) requires the applicant to provide a QA program consistent with Appendix B to 10 CFR Part 50 for design, fabrication and construction activities. Regulatory Guide 1.206 section C.I.17.5.3 states that the FSAR should 1) describe how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations, 2) should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented, 3) identify major work interfaces for activities affecting quality, and 4) describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Attachment 3 to NRC 3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states in late April 2007, Detroit Edison formally established a small Nuclear Development group to oversee the COLA project and secured the services of an OE (B&V, Ann Arbor) to support owner-related activities. In November 2007, anticipating the activities necessary to receive, review and accept the COLA work product from B&V, Detroit Edison began to develop the necessary staffing to support the receipt, acceptance review, submittal, NRC review, and concurrent maintenance of the COLA. The increase in staffing also included the addition of an experienced QA professional.

In Attachment 1 to NRC3-09-0041, "Detroit Edison Reply to a Notice of Violation 05200033/2009-201, 02, and 03," dated November 9, 2009, Detroit Edison asserts that the requirements of Appendix B to 10 CFR Part 50 were not applicable to Detroit Edison prior to September 18, 2008, because Detroit Edison was not yet an applicant. Detroit Edison also contends that, prior to becoming an applicant, a QA program was established by contractually delegating the work of establishing and executing the QA program to the COLA contractor.

Sufficient detail has not been provided in the Fermi 3 FSAR to enable the NRC staff to reach a final conclusion on whether all Fermi 3 project safety-related activities completed prior to the COL application date were consistent with the requirements of Appendix B to 10 CFR Part 50.

Please provide a table summarizing QA support of Fermi 3 safety-related activities completed or in process prior to September 18, 2008. Specifically, please include the following information limited to Fermi 3 safety-related activities conducted prior to September 18, 2008: 1) list of Detroit Edison QA personnel providing project support including hire dates, QA qualification types & dates, type of QA support provided, and percentage dedicated to project if less than full time, 2) summary by job classification of Black & Veatch (B&V)-Ann Arbor QA personnel providing project support including, QA qualification types, type of QA support provided, and number of hours dedicated to project, and 3) summary by job classification of B&V (Overland Park, Kansas) QA personnel providing project support including, QA qualification types, type of QA support provided, and number of hours dedicated to project. Please include position titles

for Detroit Edison personnel, while B&V data should be summarized by job classification. Please do not include names of personnel.

Note: This RAI is supplemental to RAI 17.5-3 included in NRC RAI Letter No. 10, dated August 12, 2009.

Request for Additional Information No. 4411, Revision 1

17.5-18

10 CFR 52.79(a)(25) requires the applicant to provide a QA program consistent with Appendix B to 10 CFR Part 50 for design, fabrication and construction activities. Regulatory Guide 1.206 section C.I.17.5.3 states that the FSAR should 1) describe how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations, 2) should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented, 3) identify major work interfaces for activities affecting quality, and 4) describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Attachment 3 to NRC 3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states Detroit Edison staff drafted the *Nuclear Development Quality Assurance Program Document* (ND QAPD) and implementing procedures for those elements of the ND QAPD associated with the activities planned to be performed by Detroit Edison at the time (e.g., review of B&V COLA work product). The ND QAPD was approved for use in February 2008 and remained in effect until the Fermi 3 COLA was filed in September 2008 and the Fermi 3 QAPD superseded it.

In Attachment 1 to NRC3-09-0041, "Detroit Edison Reply to a Notice of Violation 05200033/2009-201, 02, and 03," dated November 9, 2009, Detroit Edison asserts that the requirements of Appendix B to 10 CFR Part 50 were not applicable to Detroit Edison prior to September 18, 2008, because Detroit Edison was not yet an applicant. Detroit Edison also contends that, prior to becoming an applicant, a QA program was established by contractually delegating the work of establishing and executing the QA program to the COLA contractor.

Sufficient detail has not been provided in the Fermi 3 FSAR to enable the NRC staff to reach a final conclusion on whether all Fermi 3 project safety-related activities completed prior to the COL application date were consistent with the requirements of Appendix B to 10 CFR Part 50.

Please provide a table summarizing the ND QAPD and Fermi 3 implementing procedures effective prior to September 18, 2008. Please include a brief description of the implementing procedure (or change to procedure, if revision) and the effective dates of all revisions. Also note when the ND QAPD orimplementing procedures were contractually imposed on, or applied by, contracted personnel, if applicable.

Note: This RAI is supplemental to RAI 17.5-3 included in NRC RAI Letter No. 10, dated August 12, 2009.

Request for Additional Information No. 4412, Revision 1

17.5-19

10 CFR 52.79(a) requires the applicant FSAR to contain sufficient depth of information to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license. 10 CFR 52.79(a)(25) requires the applicant to provide a QA program consistent with Appendix B to 10 CFR Part 50 for design, fabrication and construction activities.

Appendix B establishes quality assurance requirements for the design, manufacture, construction, and operation of the structures, systems, and components of the facility. The pertinent requirements of this appendix apply to all activities affecting the safety-related functions of the structures, systems, and components to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

Regulatory Guide 1.206 section C.I.17.5.3 states that the FSAR should 1) describe how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations, 2) should identify the responsible organization and the process for verifying that delegated QA functions are effectively implemented, 3) identify major work interfaces for activities affecting quality, and 4) describe how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

Attachment 3 to NRC 3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states the following attributes from Reg. Guide 1.206, C.I.17.5.3 are discussed for each of the three distinct project periods:

1. Description of how the applicant will retain responsibility for, and maintain control over, those portions of the QA program delegated to other organizations;

2. Identification of the responsible organization and the process for verifying that delegated QA functions are effectively implemented;

3. Identification of major work interfaces for activities affecting quality, and

4. Description of how clear and effective lines of communication between the applicant and its principal contractors are maintained to assure coordination and control of the QA program.

The NRC staff has reviewed Attachment 3 to NRC3-09-0027, which includes proposed changes to FSAR part 2, chapter 17.5, and found it included descriptive project information that leads to a better understanding of the history of the Fermi 3 project. Furthermore, the NRC staff determined that the information presented did not fully address the four attributes contained in Regulatory Guide 1.206 section C.I.17.5.3, as stated in Attachment 3, nor did it provide justification for any exceptions to the Regulatory Guide 1.206 guidance.

Please clarify how FSAR part 2, chapter 17.5, meets the requirements of 10 CFR 52.79(a)(25) through the guidance provided in Regulatory Guide 1.206, or alternatively, provide justification for any exceptions to the guidance. Specifically, describe how the four attributes from

Regulatory Guide 1.206 section C.I.17.5.3 are met for the Fermi 3 project for each of the three project periods presented in Attachment 3 to NRC3-09-0027.

Note: This RAI is supplemental to RAI 17.5-3 included in NRC RAI Letter No. 10, dated August 12, 2009.

Request for Additional Information No. 4486, Revision 1

Fermi Unit 3
Detroit Edison
Docket No. 52-033
SRP Section: 14.03.12 - Physical Security Hardware
Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: NUREG-0800 Chapter 14.3.12

14.03.12-1

ITAAC # 1

Fermi Unit 3, S-COL application revision 1, Part 10, Combine License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), addresses the GE Hitachi Design Control Document (DCD), Tier 1, Table 2.19-1, revision 6, as providing specifies design commitments and ITAAC for the physical security system to be used as Fermi 3's as alternative method to the SRP 14.3.12, Physical Security Hardware-ITAAC (PS-ITAAC). The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule requirements. Review and confirm the below listed PS-ITAAC properly reflects the applicant's intentions based on the SRP and the most current revision of the DCD.

The below PS-ITAAC reference numbers from DCD, Tier 1 Table 2.19-1, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) (Draft), 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML ML092600348)

DCD Table 2.1.9-1 # 1a	SRP Appendix "A" #1
DCD Table 2.1.9-1 # 13a	SRP Appendix "A" #13a
DCD Table 2.1.9-1 # 14a	SRP Appendix "A" #14a

Regulatory Basis*:* 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-2

ITAAC # 2

Fermi, S-COL application revision 1, Part 10, Combine License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security ITAAC (PS-ITAAC) are contained in the DCD Tier 1. The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule

requirements. The current revision of the DCD deleted several PS-ITAAC that were outside of the scope of the DCD. Review and confirm each PS-ITAAC listed below to verify that it properly reflects the applicants intentions based on the SRP and the most current revision of the DCD. Verify and provide the status of any tentative COL action items assigned based on DCD changes. Explain what actions the applicant will take to revise PS-ITAAC to reflect the applicant's intentions in the S-COL application.

The below ITAAC reference numbers from (DCD), Tier 1, Table 2.19-1, revision 6, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) (Draft), 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML ML092600348)

DCD Table 2.1.9-1 # 2a	SRP Appendix "A" #2a
DCD Table 2.1.9-1 # 2b	SRP Appendix "A" #2b
DCD Table 2.1.9-1 # 2c	SRP Appendix "A" #2c
DCD Table 2.1.9-1 # 3a	SRP Appendix "A" #3a
DCD Table 2.1.9-1 # 3b	SRP Appendix "A" #3b
DCD Table 2.1.9-1 # 3c	SRP Appendix "A" #3c
DCD Table 2.1.9-1 # 4a	SRP Appendix "A" #4a
DCD Table 2.1.9-1 # 4b	SRP Appendix "A" #4b
DCD Table 2.1.9-1 # 4c	SRP Appendix "A" #4c
DCD Table 2.1.9-1 # 5	SRP Appendix "A" #5
DCD Table 2.1.9-1 # 7	SRP Appendix "A" #7
DCD Table 2.1.9-1 # 8a	SRP Appendix "A" #8a
DCD Table 2.1.9-1 # 8b	SRP Appendix "A" #8b
DCD Table 2.1.9-1 # 9	SRP Appendix "A" #9
DCD Table 2.1.9-1 # 11c	SRP Appendix "A" #11c
DCD Table 2.1.9-1 # 11b	SRP Appendix "A" #11c

***Regulatory Basis**:* 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-3

ITAAC # 3

Fermi, S-COL application revision 1, Part 10, Combine License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security PS ITAAC are contained in the DCD Tier 1. The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule requirements. The current revision of the DCD does not fully address the below listed PS-ITAAC. Explain how Fermi 3, will address these PS ITAAC areas? Explain what actions the applicant will take to revise the PS-ITAAC to reflect the applicant's intentions in the S-COL application.

The below ITAAC reference numbers from (DCD), Tier 1, Table 2.19-1, revision 6, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) (Draft), 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML ML092600348)

Regulatory Basis: 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

DCD Table 2.1.9-1 # 1b	SRP Appendix "A" #1a
DCD Table 2.1.9-1 # 6a	SRP Appendix "A" #6
DCD Table 2.1.9-1 # 10a	SRP Appendix "A" #10
DCD Table 2.1.9-1 # 11a	SRP Appendix "A" #11a
DCD Table 2.1.9-1 # 11b-1	SRP Appendix "A" #11b
DCD Table 2.1.9-1 # 12a	SRP Appendix "A" #12
DCD Table 2.1.9-1 # 13b-1	SRP Appendix "A" #13b
DCD Table 2.1.9-1 # 15a	SRP Appendix "A" #15
DCD Table 2.1.9-1 # 16a-1	SRP Appendix "A" #16a
DCD Table 2.1.9-1 # 16b-1	SRP Appendix "A" #16b
DCD Table 2.1.9-1 # 16c-1	SRP Appendix "A" #16c

Request for Additional Information No. 4487, Revision 1

Fermi Unit 3
Detroit Edison
Docket No. 52-033
SRP Section: 13.06.01 - Physical Security - Combined License
Application Section: NUREG-0800 Chapter 13.6

13.06.01-1

NEDE-33391, Rev 2, ESBWR "Safeguards Assessment Report." Describe how the specific security features identified in NEDE-33391 will be tracked, incorporated, verified, and demonstrated for Fermi Unit 3 physical protection program.

Regulatory Basis: 10 CFR Part 73.55(a): (2) The security plans must identify, describe, and account for site-specific conditions that affect the licensee's capability to satisfy the requirements of this section. (3) The licensee is responsible for maintaining the onsite physical protection program in accordance with Commission regulations through the implementation of security plans and written security implementing procedures.

Request for Additional Information No. 4489, Revision 1

13.06.01-2

Physical Security Plan, Section 9, clarify the statement "Security Officers are properly equipped with weapons and equipment..." Page 4 of the PSP does not appear to include the title "security officer." However, "Armed Security Officer" and "Unarmed individuals" are defined. Clarify whether all "Security Officers" are armed.

Regulatory Basis: 10 CFR 73.55(k)(6). Armed security officers. (i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties. (ii) The minimum number of armed security officers designated to strengthen onsite response capabilities must be documented in the security plans.

Request for Additional Information No. 4493, Revision 5

Fermi Unit 3
Detroit Edison
Docket No. 52-033
SRP Section: 12.02 - Radiation Sources
Application Section: 12.2.2

12.02-6

Combined License (COL) Information Item EF3 COL 12.2-2-A in Section 12.2.2.1, “Airborne Releases Offsite,” states in part that site-specific doses are discussed in Subsection 12.2.2.2, “Airborne Dose Evaluation Offsite.” COL Information Item EF3 COL 12.2-2-A in Section 12.2.2.2, “Airborne Dose Evaluation Offsite,” states in part that calculations of doses and pathways are provided in Tables 12.2-18aR and 12.2-18bR, which then further reference meteorological information from Table 12.2-15R.

Site-specific information in Combined License Information Item 2.0-2-A includes Figure 2.1-203 to describe the site boundary. Table 12.2-15R, Airborne Sources Calculation, in describing X/Q and D/Q data used in the calculations, refers to Tables 2.3-328 through 2.3-339. However, as shown in Table 2.3-305, the applicant did not appear to have included several sectors that occur over the adjacent Lake Erie in calculating the dose to individuals at the site boundary. The site boundary over Lake Erie is irregular and appears to be a shorter distance, less than the 800 meter bounding value from the ESBWR DCD which the applicant incorporated by reference, and the distance to site boundary is marked “NA” instead of indicating the distance. It is not clear whether the applicant included the sectors marked "NA" as part of its assessment and estimate of the following:

(1) the annual average airborne release concentrations at the boundary of the unrestricted area in accordance with 10 CFR 20 limits,

(2) the annual air dose at the site boundary in accordance with 10 CFR 50, Appendix I, Section II.B, or

(3) the annual dose or dose commitment in 10 CFR 50, Appendix I, Section II.C, for individuals traveling or conducting activities on the water at or outside the site boundary.

Please provide information for the DCD Tier 2, Chapter 12, Section 12.2.2, " Airborne and Liquid Sources for Environmental Consideration," regarding assessments and estimated doses pursuant to 10 CFR 20 and 10 CFR 50, Appendix I, Sections II.B and II.C, for those portions of the site boundary which extend over Lake Erie as shown in Figure 2.1-203.

It also appears from the marked site boundary in Figure 2.1-203 that there are portions of the open waters of Lake Erie that are in close proximity to the plant and within the site boundary. Please clarify whether the entire area within the marked site boundary over Lake Erie would under the control of the licensee, or if members of the public traveling upon Lake Erie would have unrestricted access to these areas within the site boundary.

Please also clarify the numbering convention for these two COL Information Items in the application:

(1) EF3 COL 12.2-2-A in Section 12.2.2.1

(2) EF3 COL 12.2-2-A in Section 12.2.2.2