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DTE Energy



10 CFR 50.55a

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NRC-10-0063

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's Letter to NRC, "Submittal of the Inservice Testing Program Relief Requests for Pumps and Valves - Third Ten-Year Interval," NRC-09-0064, dated November 3, 2009
 - 3) Detroit Edison's Letter to NRC, "Response to Request for Additional Information Regarding Relief Requests PRR-006 and PRR-009 for Inservice Testing Program Third Ten-Year Interval," NRC-10-0010, dated February 19, 2010

Subject: Additional Clarification Regarding Relief Request PRR-009 for the Inservice Testing Program Third Ten –Year Interval

In Reference 2, Detroit Edison submitted proposed relief requests for the third ten-year interval of the Inservice Testing Program for Pumps and Valves. In Reference 3, Detroit Edison submitted a response to a request for additional information regarding Relief Requests PRR-006 and PRR-009. In a subsequent telephone conversation between NRC staff and Detroit Edison personnel on July 27, 2010, the NRC requested additional clarification regarding Relief Request PRR-009, Relief from Fixed Reference Value Testing.

The clarification requested by the NRC staff is enclosed.

There are no new commitments included in this document.

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Should you have any questions or require additional information, please contact Mr. Rodney W. Johnson of my staff at (734) 586-5076.

Sincerely,

A handwritten signature in black ink, reading "Joseph H. Plone". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Enclosure

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

**Enclosure to
NRC-10-0063**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**Additional Clarification Regarding Relief Request PRR-009
for the Inservice Testing Program Third Ten –Year Interval**

Additional Clarification Regarding Relief Request PRR-009

During a conference call between NRC staff and Detroit Edison personnel on July 27, 2010, the NRC requested additional clarification regarding Relief Request PRR-009, Relief from Fixed Reference Value Testing. Specifically, the NRC requested clarification of the operating margin for the pumps affected by Relief Request PRR-009 and an explanation of what the Data Normalization technique will be used for.

The requested clarification is provided below:

Operating Margin:

The following table shows the available margin between the average of the last three test values and the IST Required Action Low criteria with the exception of RHR Service Water Pump C. This pump has been recently replaced; therefore, margin is based on the average of only two available test values.

Pump	Description	Margin
E1151C001A	RHR Service Water A	8.43%
E1151C001B	RHR Service Water B	7.89%
E1151C001C	RHR Service Water C	8.29%
E1151C001D	RHR Service Water D	6.09%
P4400C002A	Emergency Equipment Cooling Water A	4.23%
P4400C002B	Emergency Equipment Cooling Water B	5.00%
T4100C040	South CCHVAC Chilled Water	8.41%
T4100C041	North CCHVAC Chilled Water	8.30%

Test Acceptance Criteria and Data Normalization:

For all pumps, the initial acceptance criteria for minimum and maximum differential pressure (DP) are calculated per ASME 2004 OM Code, Section ISTB, as a function of the existing single point reference DP values. The criteria are then conservatively truncated as described in Relief Request PRR-009 provided in Reference 2.

The minimum and maximum DP acceptance criteria are contained in the pump surveillance test procedures. If any test data falls outside these limits, the pump is declared inoperable.

The data normalization technique, as described in Relief Request PRR-009 provided in Reference 2, is used by the IST program manager for long term and short term trend analysis. Data normalization is completed separately from surveillance testing, subsequent to the test date.