The Detroit Edison Company
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DTE Energy
Detroit Edison

10 CFR 52.79

November 19, 2010
NRC3-10-0051

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

References: 1) Fermi 3
Docket No. 52-033
2) Letter from Jerry Hale (USNRC) to Jack M. Davis (Detroit Edison), "Request for Additional Information Letter No. 47 Related to the SRP Section 13.3 for the Fermi 3 Combined License Application," dated November 1, 2010

Subject: Detroit Edison Company Response to NRC Request for Additional Information Letter No. 47

In Reference 2, the NRC requested additional information (RAI) to support the review of a certain portion of the Fermi 3 Combined License Application (COLA). The response to this RAI is provided in Attachment 1 of this letter. Information contained in this response will be incorporated into a future COLA submission as described in the RAI response.

If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 19th day of November 2010.

Sincerely,

Peter W. Smith, Director
Nuclear Development – Licensing & Engineering
Detroit Edison Company

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NRO

Attachments: 1) Response to RAI Letter No. 47 (Question No. 13.03-55)

cc: Adrian Muniz, NRC Fermi 3 Project Manager
Jerry Hale, NRC Fermi 3 Project Manager
Bruce Olson, NRC Fermi 3 Environmental Project Manager
Fermi 2 Resident Inspector
NRC Region III Regional Administrator
NRC Region II Regional Administrator
Supervisor, Electric Operators, Michigan Public Service Commission
Michigan Dept. of Natural Resources & Environment
Radiological Protection Section

Attachment 1
NRC3-10-0051

Response to RAI Letter No. 47
(eRAI Tracking No. 5086)

RAI Question No. 13.03-55

NRC RAI 13.03-55

Supplemental RAI 13.03-21: Exercises and Drills

In response to RAI 13.03-14-03, the applicant explained that no dedicated Post-Accident Sampling System is required for the ESBWR design. The applicant explained that post-accident monitoring is adequate to implement the Emergency Plan without reliance on post-accident sampling capability and provided a revised Section II.N. that omitted Section II. N .2.e, "Radiation Protection Drills."

As described in NUREG-0654/FEMA-REP-1; Evaluation Criterion N.2, Health Physics drills shall be conducted semi-annually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. Although no dedicated PASS is required for the ESBWR design, Health Physics drills are required. Describe the frequency and content of Health Physics drills. Include this information in the Emergency Plan.

Response

In response to RAI 13.03-14.03, (Detroit Edison Letter NRC3-09-0034 dated December 7, 2009, [ML093440828]), Detroit Edison removed section II.N.2.e, "Radiation Protection Drills" from the Fermi Unit 3 COLA Emergency Plan. The reason this section was removed was due to the ESBWR not having a post-accident sampling system, and thus NUREG-0654/FEMA-REP-1, Evaluation Criterion II.N.2.e did not apply.

Detroit Edison has revised section II.N.2 of the Fermi Unit 3 COLA Emergency Plan to clarify that Radiation Protection drills involving the sampling and analysis of simulated elevated radioactive airborne and liquid samples, as well as direct radiation measurements in the plant environment will be conducted semi-annually. These drills may be conducted in conjunction with the required biennial exercise.

Proposed COLA Revision

Revised section II.N.2 of the Fermi 3 Emergency Plan to include the frequency and content of the Radiation Protection Drills.

Markup of Detroit Edison COLA
(following 1 page)

The following markup represents how Detroit Edison intends to reflect this RAI response in a future submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

e. Radiation Protection Drills

Radiation Protection drills involving the sampling and analysis of simulated elevated radioactive airborne and liquid samples, as well as direct radiation measurements in the plant environment, shall be conducted semi-annually. These drills may be conducted in conjunction with the required biennial exercise.

d. Radiological Monitoring Drills

Plant environs and radiological monitoring drills (onsite and offsite) shall be conducted annually. These drills include collection and analysis of sample media (such as water, vegetation, and soil from the Owner Controlled Area or nearby offsite areas and provisions for communications and record keeping. Collection of milk is demonstrated during conduct of ingestion pathway exercises.

f. ~~e.~~ Additional Drills

1. Additional drills will be scheduled, as necessary, to provide adequate training of personnel; provide emphasis on weak areas; and ensure an adequate level of emergency preparedness.

2. During the interval between biennial exercises, at least one (1) "off year" drill should be conducted at the plant involving principal areas of onsite emergency response capabilities. These areas include management and coordination of emergency response, accident assessment, protective action decision-making, and plant system repair and corrective action. The drill may involve no participation or limited participation by offsite agencies, although a routine offer is made to determine the extent of offsite agency participation.

3. Conduct of Drills and Exercises

Advance knowledge of a drill/exercise scenario will be kept to a minimum to allow "free play" decision making and to ensure a realistic participation by those involved.

Drill and exercise scenarios will contain, as a minimum, the following:

a. The basis objective(s) of the drill or exercise and the appropriate evaluation criteria.

b. The date(s), time period, location of the drill or exercise, and participating organizations.

c. The simulated events.

d. A list of anticipated Drill/Exercise Performance (DEP) opportunities including classification, notifications, and protective action recommendations.

e. A time schedule of real and simulated initiating events.

f. A narrative summary describing the conduct of the drill or exercise and includes such items as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of emergency teams, and public information activities.

g. Assignments for qualified controllers/evaluators and provisions for observers from federal, state, and local organizations, as appropriate.