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DTE Energy



10 CFR 2.202

April 02, 2012
NRC-12-0022

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

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Letter EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012

Subject: Detroit Edison's Answer to March 12, 2012 Commission Order Modifying License With Regard to Requirements for Mitigation Strategies for Beyond-Design Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC") issued an immediately effective order in the captioned matter entitled "Order Modifying License with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately)" ("Order") to, *inter alia*, Detroit Edison. The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC has decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC is requiring additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis external events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event

of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, Detroit Edison hereby submits its answer to the Order. Detroit Edison consents to the Order and does not request a hearing. Based on information currently available, Detroit Edison has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Detroit Edison has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. Detroit Edison will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, due the unavailability of implementing guidance until August 2012, the ultimate scope of required work is uncertain. The potential impact on Detroit Edison's ability to comply with the specific compliance deadline dates depends on the availability of this guidance. Detroit Edison's future responses may include schedule relief requests as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

Should you have any questions or require additional information, please contact Mr. Kirk R. Snyder, Manager, Industry Interface at (734) 586-5020.

Sincerely,



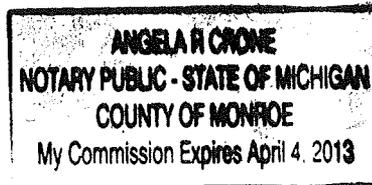
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cc: Director, Office of Nuclear Reactor Regulation
NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

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

Joseph H. Plona
Site Vice President, Nuclear Generation



On this second day of April 2012,
2012 before me personally appeared Joseph H. Plona, being first duly sworn and says
that he executed the foregoing as his free act and deed.

Angela R Crone