

Joseph H. Plona
Site Vice President

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10 CFR 50.90

July 6, 2012
NRC-12-0044

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, "Proposed License Amendment to Modify Technical Specification Surveillance Requirements for Safety Relief Valves," NRC-12-0004, dated January 10, 2012

Subject: Response to Request for Additional Information Regarding Proposed License Amendment to Modify Technical Specification Surveillance Requirements for Safety Relief Valves

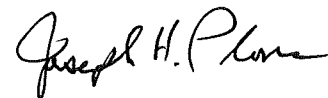
In Reference 2, Detroit Edison proposed a license amendment to the Fermi 2 Operating License to amend the Fermi 2 Plant Operating License, Appendix A, Technical Specifications (TS) to modify Surveillance Requirement (SR) 3.4.3.2, in TS 3.4.3, "Safety Relief Valves (SRVs)", SR 3.5.1.13, in TS 3.5.1, "ECCS-Operating," and SR 3.6.1.6.1, in TS 3.6.1.6, "Low-Low Set (LLS) Valves." This proposed amendment was to replace the current requirement in these TS SRs to verify the SRV opens when manually actuated with an alternate requirement that verifies the SRV is capable of being opened. In an e-mail from Mr. Mahesh Chawla to Mr. Alan Hassoun dated June 6, 2012, the NRC requested additional information regarding the proposed change. The enclosure to this letter provides Detroit Edison's response to the requested information.

No new commitments are being made in this submittal.

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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.

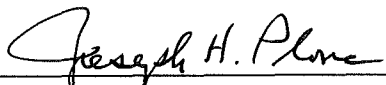
Sincerely,

A handwritten signature in black ink, appearing to read "Joseph H. Plone". The signature is written in a cursive style with a large initial "J".

Enclosure: Response to Request for Additional Information

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

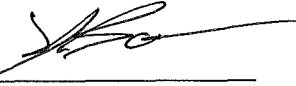
I, Joseph H. Plona, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



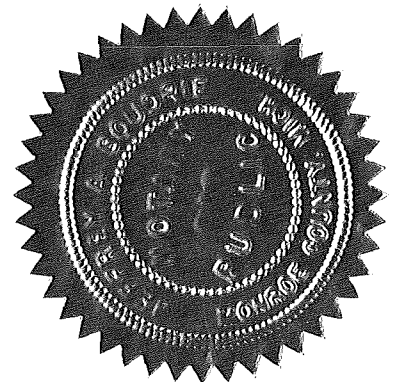
Joseph H. Plona
Site Vice President, Nuclear Generation

On this 06th day of July, 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.

JEFFREY A. BOUDRIE
NOTARY PUBLIC, STATE OF MI
COUNTY OF MONROE
MY COMMISSION EXPIRES Nov 14, 2018
ACTING IN COUNTY OF MONROE



Notary Public



**Enclosure to
NRC-12-0044**

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

Response to Request for Additional Information

Detroit Edison's Response to NRC Request for Additional Information (RAI):

NRC RAI-1

Does the proposed testing for the subject safety relief valves (SRVs) fully meet (or exceed) the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM) Code requirements for the Fermi 2, current, "Code of Record"?

Response:

The current Fermi 2 Inservice Test (IST) Program complies with the requirements of the ASME OM Code 2004 edition. Mandatory Appendix I, Section I-3410(d) requires that SRVs be subjected to verification of the electrical and pneumatic connections either through mechanical / electrical inspection or through test, and Section I-1320 requires testing 20 percent of the SRV pilots every 24 months. The testing proposed in Reference 2 fully meets the requirements of the ASME OM Code 2004 edition.

Five of the 15 SRVs are also part of the Automatic Depressurization System (ADS) and are categorized as Category B valves in the IST Program. These five valves have a safety function to open automatically on ADS actuation; however, ISTC-1200 Exemptions contain the following statement: "Category A and Category B safety and relief valves are excluded from the requirements of ISTC-3700, Valve Position Verification and ISTC-3500, Valve Testing." Therefore, there is no OM Code requirement to perform exercise or stroke time testing of the ADS SRVs. They are currently listed in the IST Program Plan with a stroke time test requirement as a conservative Code application based on the current Technical Specification requirement for stroke testing on startup. The IST Program Plan will be revised to remove the stroke time test requirement as part of the implementation of the proposed license amendment request.

NRC RAI-2

Please describe the SRV actuator functional test mentioned in the Technical Analysis.

Response:

The procedure for testing performed at the offsite test facility contains a section for testing manual mode actuation. This section of the procedure will be validated and used to verify that SRVs are capable of being opened. The procedure requires applying steam pressure to the SRV at approximately 1000 psig, pressurizing the SRV solenoid to approximately 70 psig, and energizing the SRV solenoid valve with approximately 125 VDC. Parameters such as steam inlet pressure, pilot disc motion, main disc motion, solenoid actuation signal and valve response time are recorded.

NRC RAI-3

The Technical Analysis states that each SRV is lift-tested every five years per the ASME OM Code. Is the testing of the fifteen SRVs at Fermi also staggered over a five year period?

Response:

All fifteen SRV pilot valves are setpoint tested by an offsite test facility each refuel cycle. Staggering is not required because all 15 SRV pilot valves are exchanged each refuel cycle.

Stroke testing of the 15 SRV main bodies is currently performed during plant startup. With the implementation of the proposed license amendment, it is planned to stroke test each SRV main body once every five years per the ASME OM Code. This testing will be performed by an offsite test facility and will be staggered over the five year period.