The Detroit Edison Company
One Energy Plaza, Detroit, MI 48226-1279

DTE Energy
Detroit Edison

10 CFR 52.79

July 13, 2012
NRC3-12-0023

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. 77 Related to Chapter 1.05 for the Fermi 3 Combined License Application," dated May 17, 2012
3) SECY-12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami," dated February 17, 2012
4) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Response to NRC Request for Additional Information Letter No. 77," NRC3-12-0018, dated June 18, 2012

Subject: Detroit Edison Company Response to NRC Request for Additional Information Letter No. 77

In Reference 2, the NRC requested additional information to support the review of certain portions of the Fermi 3 Combined License Application (COLA). The Requests for Additional Information (RAIs) in Reference 2 address the Fukushima Near-Term Task Force recommendations contained in Reference 3.

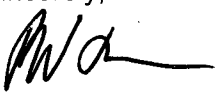
In Reference 4, Detroit Edison committed to provide the response to RAI 01.05-2 within the requested 60-day timeframe. The response to that RAI is contained in Attachment 1 of this letter.

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

D095
NRO

I state under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of July 2012.

Sincerely,



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

Attachment: 1) Response to RAI Letter No. 77 (Question No. 01.05-2)

cc: Adrian Muniz, NRC Fermi 3 Project Manager
Tekia Govan, NRC Fermi 3 Project Manager
Michael Eudy, NRC Fermi 3 Project Manager (w/o attachment)
Bruce Olson, NRC Fermi 3 Environmental Project Manager (w/o attachment)
Fermi 2 Resident Inspector (w/o attachment)
NRC Region III Regional Administrator (w/o attachment)
NRC Region II Regional Administrator (w/o attachment)
Supervisor, Electric Operators, Michigan Public Service Commission (w/o attachment)
Michigan Department of Natural Resources and Environment
Radiological Protection Section (w/o attachment)

Attachment 1
NRC3-12-0023
(6 pages)

Response to RAI Letter No. 77
(eRAI Tracking No. 6446)

RAI Question No. 01.05-2

NRC RAI 01.05-2

The NRC staff has been directed by the Commission to implement the Fukushima Near-Term Task Force recommendations contained in SECY-12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami" dated February 17, 2012. Request For Information Pursuant To Title 10 Of The Code of Federal Regulations 50.54(F) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident (ADAMS Accession No. ML12073A348) for all power reactor licensees and holders of construction permits in active or deferred status requires additional information specific to Recommendation 9.3, "Emergency Preparedness: Communications." The NRC staff requests that you assess the communications systems and equipment used during an emergency event as described in Enclosure 5 of this request for information (ADAMS Accession No. ML12056A051), including any proposals for changes to your current application.

In order to minimize delays to the current licensing schedule, we request that you respond within 60-days of receipt of this RAI or provide a schedule for your response within 30-days.

Response

Detroit Edison proposes the license condition summarized below to address provisions that shall be taken to enhance emergency preparedness related to communications per Recommendation 9.3 provided in the March 12, 2012, letter (ML12053A340) to licensees and construction permit holders.

The proposed license condition requires Detroit Edison to perform an assessment of the on-site and offsite communications systems at least two years prior to scheduled initial fuel load. The communications assessment will likely be accomplished at an earlier date (pending rulemaking and regulatory guidance development) to support equipment procurement and installation, development and training of the emergency response organization, and performance of the full participation exercise. Corrective actions from the assessment shall be identified and implemented at least 180 days prior to scheduled initial fuel load. The timeframe of 180 days prior to scheduled initial fuel load for completion of the corrective actions is also consistent with the completion milestones for program implementation, as described in FSAR Chapter 13.

The proposed license condition reads as follows:

Emergency Planning Actions

The applicant is proposing the following license condition related to communications:

At least two (2) years prior to scheduled initial fuel load, the licensee shall have performed an assessment of on-site and offsite communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions. The communications capability assessment will be performed in accordance with NEI 12-01, "Guidance for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0, or other NRC approved guidance in effect six months prior to completion of the assessment.

At least one hundred eighty (180) days prior to scheduled initial fuel load, the licensee shall complete implementation of corrective actions identified in the communications capability assessment described above, including any related emergency plan and implementing procedure changes and associated training.

Proposed COLA Revision

Part 10, Section 3, "Fermi 3 Proposed License Conditions," is revised as shown on the attached markup.

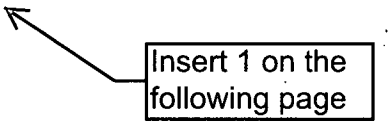
Markup of Detroit Edison COLA
(following 2 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in the next submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by 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.

3.7 Emergency Planning Actions

Because various equipment set points and other information cannot be determined until as-built information is available, the COLA does not fully address certain aspects of the Emergency Action Level (EAL) scheme. Thus, COL applicants using EAL schemes in accordance with NEI 07-01 are proposed the following license condition:

The licensee shall submit a fully developed set of site-specific EALs to the NRC in accordance with the NRC-endorsed version of NEI 07-01, Revision 0, with no deviations. The fully developed site-specific EAL scheme shall be submitted to the NRC for confirmation at least 180 days prior to initial fuel load.



Insert 1

3.8 Fukushima Actions

3.8.1 Emergency Planning Actions

The applicant is proposing the following license condition related to communications:

At least two (2) years prior to scheduled initial fuel load, the licensee shall have performed an assessment of on-site and offsite communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions. The communications capability assessment will be performed in accordance with NEI 12-01, "Guidance for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0, or other NRC approved guidance in effect six months prior to completion of the assessment.

At least one hundred eighty (180) days prior to scheduled initial fuel load, the licensee shall complete implementation of corrective actions identified in the communications capability assessment described above, including any related emergency plan and implementing procedure changes and associated training.