

DTE Energy  
One Energy Plaza, Detroit, MI 48226-1279



10 CFR 52.79

April 30, 2013  
NRC3-13-0016

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

- References:
- 1) Fermi 3  
Docket No. 52-033
  - 2) Letter from Tekia Govan (USNRC) to Peter W. Smith (Detroit Edison),  
"Request for Additional Information Letter No. 79 Related to Chapters  
03.07.02 and 13.03 for the Fermi 3 Combined License Application," dated  
August 7, 2012
  - 3) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison  
Company Response to NRC Request for Additional Information Letter No. 79,"  
NRC3-12-0026, dated September 7, 2012

Subject: DTE Electric Company Supplemental Response to NRC Request for  
Additional Information Letter No. 79

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In Reference 2, the NRC requested additional information to support the review of certain portions of the Fermi 3 Combined License Application (COLA). Request for Additional Information (RAI) 13.03-65 in Reference 2 is related to Fukushima Near-Term Task Force Recommendation 9.3. The initial response to RAI 13.03-65 was provided in Reference 3. The staff has requested that the proposed license condition that was included in Reference 3 be revised. As such, Attachment 1 provides a supplemental response to RAI 13.03-65.

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 30<sup>th</sup> day of April 2013.

Sincerely,

Peter W. Smith, Director  
Nuclear Development – Licensing and Engineering  
DTE Electric Company

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USNRC  
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Attachment: 1) Supplemental Response to RAI Letter No. 79 (Question No. 13.03-65)

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 to  
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**Attachment 1**  
**NRC3-13-0016**  
(4 pages)

**Supplemental Response to RAI Letter No. 79**  
**(eRAI Tracking No. 6627)**

**RAI Question No. 13.03-65**

**NRC RAI 13.03-65**

*The NRC staff requests that you address provisions for enhancing emergency preparedness as it relates to staffing associated with Recommendation 9.3 outlined in Enclosure 5 of the March 12, 2012 letter "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." (ML12053A340).*

**Supplemental Response**

DTE Electric Company initially responded to RAI 13.03-65 in letter NRC3-12-0026, dated September 7, 2012 (ML12261A191). The initial response to RAI 13.03-65 provided a proposed license condition to address provisions that shall be taken to enhance emergency preparedness related to staffing per Recommendation 9.3 provided in the March 12, 2012, letter (ML12053A340) to licensees and construction permit holders.

The NRC staff has requested that the phrase "or other NRC endorsed guidance in effect six months prior to commencement of the assessment" be removed from the proposed license condition. COLA Markups that incorporate the requested change are provided with this response. The proposed license condition in the COLA, Part 10, Subsection 3.8.1, is revised to read:

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

At least two (2) years prior to scheduled initial fuel load, the licensee shall have performed an assessment of the onsite and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event. The staffing assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0.

At least two (2) years prior to scheduled initial fuel load, the licensee shall revise the Fermi 3 Emergency Plan to include the following:

- Incorporation of corrective actions identified in the staffing assessment described above.
- Identification of how the augmented staff will be notified given degraded communications capabilities.

**Proposed COLA Markups**

Part 10, Subsection 3.8.1, is revised as shown on the attached markup.

**Markup of Fermi 3 COLA**  
(following 1 page)

The following markup represents how DTE Electric 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.

### 3.8.1 Emergency Planning Actions

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

At least two (2) years prior to scheduled initial fuel load, the licensee shall have performed an assessment of the onsite and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event. The staffing assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0, ~~or other NRC endorsed guidance in effect six months prior to commencement of the assessment.~~

At least two (2) years prior to scheduled initial fuel load, the licensee shall revise the Fermi 3 Emergency Plan to include the following:

- Incorporation of corrective actions identified in the staffing assessment described above.
- Identification of how the augmented staff will be notified given degraded communications capabilities.

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.

Previously submitted in letter  
NRC3-13-0013 (ML13109A426).