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DTE Energy

10 CFR 52.79

July 9, 2013
NRC3-13-0022

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 (DTE Electric), "Request for Additional Information Letter No. 84 Related to Chapters 01.05 for the Fermi 3 Combined License Application," dated March 19, 2013
3) Letter from Peter W. Smith (DTE Electric) to USNRC, "DTE Electric Company Response to NRC Request for Additional Information Letter No. 84," NRC3-13-0013, dated April 18, 2013

Subject: DTE Electric Company Supplemental Response to NRC Request for Additional Information Letter No. 84

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 are related to mitigating beyond-design-basis external events and reliable spent fuel pool instrumentation.

Reference 3 provided the initial responses to the RAIs in RAI Letter No. 84. During a public meeting on June 6, 2013, the NRC staff provided feedback on the responses provided in Reference 3. The staff requested that a supplemental response to RAI 01.05-5 be provided. The staff did not request further information in response to RAI 01.05-6; however, the staff stated that the scope of the license condition associated with RAI 01.05-6 could potentially be reduced if additional information was added to the Fermi 3 Final Safety Analysis Report (FSAR). As such, supplemental responses to RAIs 01.05-5 and 01.05-6 are provided in Attachments 1 and 2, respectively. Attachment 3 provides markups of the Fermi 3 COLA resulting from the supplemental responses provided in Attachments 1 and 2.

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 9th day of July 2013.

Sincerely,

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

Attachments:
1) Supplemental Response to RAI Letter No. 84 (Question No. 01.05-5)
2) Supplemental Response to RAI Letter No. 84 (Question No. 01.05-6)
3) Markup of Fermi 3 COLA

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

Attachment 1
NRC3-13-0022
(3 pages)

Supplemental Response to RAI Letter No. 84
(eRAI Tracking No. 7046)

RAI Question No. 01.05-5

NRC RAI 01.05-5

Three-Phase Approach for Mitigating Beyond-Design-Basis External Events

For operating plants the NRC issued order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events. The order included a requirement to implement a three-phase approach that enables mitigation assuming loss of all AC power for an indefinite period. The first phase (initial phase) requires the use of installed equipment and resources to maintain or restore core cooling, containment, and spent fuel pool cooling. The second phase (transition phase) requires providing sufficient, portable, equipment and consumables to maintain or restore these functions on site until they can be accomplished with resources brought from off site. The third phase (final phase) allows for offsite assistance.

The new requirements were put into place to provide greater assurance that the plant could cope with the challenges posed by beyond-design-basis external events by incorporating into the plant design and operation greater mitigation capabilities consistent with the overall defense-in-depth philosophy.

1. *Describe how the initial and transition phase mitigation is accomplished for Fermi 3. Include a discussion of how installed equipment and resources are used for core, containment, and spent fuel cooling to provide Fermi 3 the ability to cope without power until offsite resources and assistance are available (final phase).*

2. *Define the site-specific FLEX capabilities, identify what type of FLEX equipment will be used and when it will be required. Also discuss the connection points incorporated in the Fermi 3 design that will allow for use of the FLEX equipment.*

3. *Revise the FSAR to provide a summary of how Fermi 3 accomplishes core, containment, and spent fuel cooling prior to availability of offsite assistance without any AC power or makeup to the UHS (Initial and transition phase), and how Fermi 3 will maintain core, containment, and spent fuel cooling for an indefinite period of time (final phase).*

Supplemental Response

The initial response to RAI 01.05-5 was provided in letter NRC3-13-0013 (ML13109A426), dated April 18, 2013. This supplemental response is based on discussion with the NRC in a public meeting held June 6, 2013, and in a public teleconference held on June 13, 2013. The staff requested that DTE Electric provide additional detail in response to Item 3 of RAI 01.05-5.

3. *Revise the FSAR to provide a summary of how Fermi 3 accomplishes core, containment, and spent fuel cooling prior to availability of offsite assistance without any AC power or makeup to the UHS (Initial and transition phase), and how Fermi 3 will maintain core, containment, and spent fuel cooling for an indefinite period of time (final phase).*

Based on discussion with the staff, a summary of the information in the initial response is being added to new FSAR Subsection 1.5.1.1.

Proposed COLA Revision

The Fermi 3 COLA is revised as shown on Attachment 3. Attachment 3 includes markups originating from both the response to RAI 01.05-5 (Attachment 1) and RAI 01.05-6 (Attachment 2).

FSAR Section 1.5 is revised to add new FSAR Subsection 1.5.1.1, "Post-Fukushima Near-Term Task-Force Recommendations." FSAR Subsection 1.5.1.1 contains new FSAR Subsection 1.5.1.1.1, "Recommendation 4.2, Mitigating Strategies for Beyond-Design-Basis External Events," which provides the summary discussed in this response.

The proposed license condition in Part 10, Subsection 3.8.2, "Mitigating Strategies for Beyond-Design-Basis External Events," is unchanged by this response. Proposed revisions to Part 10, Subsection 3.8.2, were provided in response to RAI 01.05-3 in DTE Electric letter NRC3-13-0008 (ML13051A657), dated February 19, 2013. For the staff's convenience, the changes made to Part 10, Subsection 3.8.2, in letter NRC3-13-0008 are reproduced in Attachment 3.

Attachment 2
NRC3-13-0022
(3 pages)

Supplemental Response to RAI Letter No. 84
(eRAI Tracking No. 7051)

RAI Question No. 01.05-6

NRC RAI 01.05-6

For operating plants the NRC issued order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (ML12054A679). The order included a requirement to provide safety enhancements in the form of reliable spent fuel pool instrumentation for beyond-design-basis external events. On August 29, 2012 the staff published Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation." This ISG endorses, with exceptions, the methodologies described in the industry guidance document, Nuclear Energy Institute (NEI) 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (NEI 12-02), Revision 1 dated August, 2012.

In response to the staff's RAI 1.5-4, the applicant proposed to create a license condition to address the instruments requirements that were not explicitly addressed by the ESBWR DCD. The staff determined that compliance with Order EA-12-051 must be addressed in greater detail prior to licensing to determine how each of the Order's instrument requirements are addressed or not addressed by the existing ESBWR DCD information, and to propose changes to the FERMI COL FSAR that address the required instrument design information that is not explicitly addressed in the ESBWR DCD.

Therefore, the staff requests the applicant to:

a. *Provide a description of how the SFP level instruments design information provided in the ESBWR DCD addresses or does not address the design criteria requirements described in Order EA-12-051, for reliable instrumentation able to withstand design-basis natural phenomena and monitor spent fuel pool water level, and*

b. *Provide a description, including proposed FSAR changes, explaining how the FERMI COL FSAR will address the design criteria requirements for SFP instrumentation described in Order EA-12-051, for reliable instrumentation able to withstand design-basis natural phenomena and monitor spent fuel pool water level, that were not completely addressed by the ESBWR DCD design information.*

Supplemental Response

The initial response to RAI 01.05-6 was provided in letter NRC3-13-0013 (ML13109A426), dated April 18, 2013. This supplemental response is based on discussion with the NRC in a public meeting held June 6, 2013, and in a public teleconference held on June 13, 2013.

The initial response to RAI 01.05-6 indicated that the information related to Order EA-12-051 was addressed in the Fermi 3 licensing basis for the ESBWR design. The Fermi 3 FSAR incorporates by reference the provisions of those ESBWR DCD sections referenced in the original response. Because the provisions are already addressed by the Fermi 3 licensing basis, no FSAR changes were proposed for the ESBWR design features.

For the program features in Order EA-12-051, the initial response to RAI 01.05-6 referenced certain sections of the Fermi 3 COLA, specifically FSAR Sections 13.2 and 13.5 and Part 10, Subsection 3.5.1. Part 10, Subsection 3.5.1 contains a license condition which provides a schedule for implementing an operator training program. Additionally, a license condition in Part 10, Subsection 3.8.3, "Reliable Spent Fuel Pool/Buffer Pool Level Instrumentation," was

referenced for addressing alternate power supplies and certain accuracy requirements for the spent fuel pool (SFP)/buffer pool level instrumentation.

Based on discussion with the staff, a summary of the information in the initial response is being added to new FSAR Subsection 1.5.1.1. The license condition in Part 10, Subsection 3.8.3, is also modified, with certain information being added to the new FSAR section and removed from the license condition.

The attached COLA markup shows how the Fermi 3 COLA will address the design criteria requirements for SFP instrumentation described in Order EA-12-051 for reliable instrumentation able to withstand design-basis natural phenomena and monitor SFP water level, including aspects that were not completely addressed by the ESBWR DCD design information. The various sections of the FSAR referenced within the FSAR Subsection 1.5.1.1 markup incorporate by reference corresponding sections of the ESBWR DCD. Thus, references in the new content for Subsection 1.5.1.1 refer to FSAR sections only, rather than referencing the corresponding DCD section.

Proposed COLA Revision

The Fermi 3 COLA is revised as shown on Attachment 3. Attachment 3 includes markups originating from both the response to RAI 01.05-5 (Attachment 1) and RAI 01.05-6 (Attachment 2).

FSAR Section 1.5 is revised to add new FSAR Subsection 1.5.1.1, "Post-Fukushima Near-Term Task-Force Recommendations." FSAR Subsection 1.5.1.1 contains new FSAR Subsection 1.5.1.1.2, "Recommendation 7.1, Reliable Spent Fuel Pool Intrumentation," which provides the summary discussed in this response.

The proposed license condition in Part 10, Subsection 3.8.3, "Reliable Spent Fuel Pool/Buffer Pool Level Instrumentation," is revised as shown on Attachment 3.

Attachment 3
NRC3-13-0022
(following 8 pages)

Markup of Fermi 3 COLA

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.

including extensive service to the Atomic Energy Commission in the development of facilities at Los Alamos, New Mexico. More recent activities include the development activities for other COLAs, the Advanced Boiling Water Reactor (AWBR) Design Certification Program, and the Department of Energy's 2010 initiative for the deployment of new nuclear plants in the United States. Various subcontractors are supporting Black & Veatch, including:

1.4.3.1 Professional Service Industries, Inc. (PSI)

PSI performed laboratory testing in support of Fermi 3 site specific evaluations in Chapter 2 and the Environmental Report. This effort included laboratory testing of rock and soil materials and water quality.

1.4.3.2 Boart Longyear

Boart Longyear performed geotechnical field investigations in support of Chapter 2. That effort included performing standard penetration tests; obtaining core samples and rock cores; performing cone penetrometer tests; supporting down-hole seismic tests and laboratory tests of soil and rock samples; installing ground water observation wells; and preparing a data report.

1.4.3.3 Geomatrix

Geomatrix Inc. performed probabilistic seismic hazard assessments and related sensitivity analyses in support of Chapter 2. These assignments included sensitivity analyses of seismic source parameters and updated ground motion attenuation relationships, development of updated Safe Shutdown Earthquake (SSE) ground motion values, and preparation of the related sections.

Other subcontractors may be added as needed.

1.4.4 Other Contractors

In addition to the major contractors listed above, contractual relationships may be established with specialized consultants to assist in developing the COLA as the need arises.

the following

1.5 Requirements for Further Technical Information

Insert 1

This section of the referenced DCD is incorporated by reference with ~~no~~ departures ~~or~~ supplements.

and/or

Insert 1

1.5.1 **Evolutionary Design**

Add the following at the end of this section.

1.5.1.1 **Post-Fukushima Near-Term Task Force Recommendations**

STD SUP 1.5-1

Following the March 11, 2011, Great Tohoku Earthquake and subsequent tsunami at the Fukushima Dai-ichi nuclear power plant, the NRC issued Orders to licensees for implementing recommendations of the Near-Term Task Force Report (Reference 1.5-201). The following subsections describe how the recommendations applicable to the ESBWR are addressed for Fermi 3.

1.5.1.1.1 **Recommendation 4.2, Mitigating Strategies for Beyond-Design-Basis External Events**

Following the March 2011 events in Japan at the Fukushima Dai-ichi nuclear power plant, the NRC issued to licensees Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (Reference 1.5-202). This Order was for implementing Recommendation 4.2 of the NRC Near-Term Task Force Report (Reference 1.5-201). Order EA-12-049 specifies a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core, containment, and spent fuel pool cooling capabilities. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources brought from off site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely. Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (Reference 1.5-203), endorses, with clarifications, the methodologies described in Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX)

Implementation Guide," (Reference 1.5-204). Although the guidance does not specifically address the ESBWR design, which employs passive design features, this subsection describes how ESBWR design features for beyond-design-basis external events meet the intent of the guidance.

For the ESBWR, the underlying strategies for coping with extended loss of AC power events involve a three-phase approach as follows:

I. Initial Phase: Initial coping is implemented through installed plant equipment, without any AC power or makeup to the ultimate heat sink (i.e., safety-related Isolation Condenser System [ICS] and Passive Containment Cooling System [PCCS] pools or Gravity-Driven Cooling System [GDCS]). For the ESBWR, this phase is covered by the existing licensing basis (i.e., 72-hr period for passive systems performance for core, containment, and spent fuel storage pools cooling).

II. Transition Phase: Following the 72-hr passive system coping time, support is required to continue passive system cooling and makeup to the Isolation Condenser/Passive Containment Cooling System (IC/PCCS) pools and spent fuel storage pools. This support is provided by installed plant ancillary equipment. The installed ancillary equipment is designed with the capacity to support passive system cooling from 3 to 7 days. As described in DCD Section 9.1.3 and Section 19A.3.1, makeup water can be provided through installed safety-related connections to the Fire Protection System (FPS) or spent fuel storage pool. Between 72 hours and seven days, the resources for performing these safety functions are available onsite.

III. Final Phase: In order to extend the passive system cooling and IC/PCCS pools and spent fuel storage pools cooling time to beyond 7 days (to an indefinite time), some offsite assistance is required. Specifically, for the ESBWR design, diesel fuel for the ancillary diesel generator or diesel fire pump must be replenished. Also, mitigation strategies including procedures, guidance, training, and acquisition, staging, or installation of equipment needed for the strategies to maintain core, containment, and spent fuel storage pools cooling for an extended period of time will be fully implemented prior to initial fuel load.

1.5.1.1.2 Recommendation 7.1, Reliable Spent Fuel Pool Instrumentation

Following the March 2011 events in Japan at the Fukushima Dai-ichi nuclear power plant, the NRC issued to licensees Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Reference 1.5-205). This Order was for implementing Recommendation 7.1 of the NRC Near-Term Task Force Report (Reference 1.5-201) for safety enhancements in the form of reliable spent fuel pool instrumentation for beyond-design-basis external events. Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation" (Reference 1.5-206), endorses, with exceptions, the methodologies described in Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" (Reference 1.5-207). Although the guidance does not specifically address the ESBWR design, which employs passive design features, this subsection describes how ESBWR design features for reliable spent fuel pool and buffer pool level instrumentation meet the intent of the guidance.

The ESBWR design provides reliable indication of the water level in spent fuel storage pools for monitoring pool water level conditions by trained personnel. As explained in Subsection 9.1.2, the design basis for storage of spent fuel includes two separate areas for storage of spent fuel assemblies: (1) a separate deep pit area in the buffer pool in the Reactor Building; and (2) the Spent Fuel Pool (SFP) in the Fuel Building. As described in Subsection 7.5.5, Subsection 9.1.2.4, and Subsection 9.1.3, safety-related level instrumentation is provided in the SFP and buffer pool, both Seismic Category I, to detect a low water level that would indicate a loss of decay heat removal ability in accordance with NRC regulatory requirements in 10 CFR Part 50 Appendix A, General Design Criterion 63. The SFP and buffer pool each have two wide-range safety-related level transmitters that transmit signals to the Main Control Room. These signals are used for collapsed water level indication and to initiate high/low-level alarms, both locally and in the Main Control Room. At a minimum, alarm set points are included at the top of the active fuel, an adequate shielding level, and an elevation just below normal water level to give operators advanced notice of a loss of inventory but with sufficient margin to allow for 72 hours of pool boiling. The SFP also contains backup nonsafety-related level indicators that can be operated using

portable onsite power supplies to indicate when the pool has been replenished to its normal water level.

Details regarding power to the instrumentation channels are in Subsection 7.1.2. In addition, instrumentation channels provide for power connections from sources independent of the plant alternating current (AC) and direct current (DC) power distribution systems, such as portable generators or replaceable batteries. Power supply designs should provide for quick and accessible connection of sources independent of the plant AC and DC power distribution systems. Onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured. The ESBWR DCD, Tier 1, Table 2.6.2-2 specifies a minimum instrument accuracy of ± 300 mm (1 ft), which meets the guidance set forth in JLD-ISG-2012-03. The instrumentation is designed to maintain its designed accuracy following a power interruption or change in power source without recalibration. Technical Specifications, Section 3.7.5, specifies periodic surveillance of the fuel pools water level during movement of irradiated fuel assemblies in the associated fuel storage pool or when irradiated fuel assemblies are stored in the associated fuel storage pool. For operating, testing, and calibrating the level instruments, training programs are described in Section 13.2 and procedures are described in Section 13.5.

1.5.4 References

1.5-201 "Recommendations for Enhancing Reactor Safety in the 21st Century, The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," July 12, 2011.

1.5-202 Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," March 12, 2012.

1.5-203 Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0.

1.5-204	NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 1, August 2012.
1.5-205	Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," March 12, 2012.
1.5-206	Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0.
1.5-207	NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" Revision 1, August 2012.

DTE Electric Company shall address the following requirements using the guidance contained in JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0:

3.8.2 Mitigation Strategies for Beyond-Design-Basis External Events

Prior to initial fuel load, ~~the following actions will be fully implemented associated with mitigation strategies including procedures, guidance, training, and acquisition, staging, or installation of equipment needed for the strategies:~~

A. Develop, implement, and maintain guidance and strategies to maintain or restore core, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. These strategies must:

- Be capable of mitigating a simultaneous loss of all AC power and loss of normal access to the normal heat sink, and
- Have adequate capacity to address challenges for core, containment, and spent fuel pool cooling capabilities at ~~all units on the~~ Fermi 3 ~~site~~, and
- Have the capability to be implemented in all modes.

3

B. Provide reasonable protection for the associated equipment from external events. Such protection must demonstrate that there is adequate capacity to address challenges to core, containment, and spent fuel pool cooling capabilities at ~~all units on the~~ Fermi ~~site~~.

Within one (1) year after issuance of the Fermi 3 COL, an overall integrated plan shall be submitted to the NRC ~~for review~~, including a description of how compliance with the requirements described in this license condition will be achieved.

Initial status reports shall be provided to the NRC sixty (60) days following issuance of the Fermi 3 COL and at six (6) month intervals following submittal of the overall integrated plan described above which delineates progress made in implementing the requirements of this license condition.

C. Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies.

Markups on this page were previously provided in DTE Electric Letter NRC3-13-0008 (ML13051A657), dated February 19, 2013.

DTE Electric Company shall address the following requirements using the guidance contained in JLD-ISG-2012-03, "Compliance with Order EA-2012-051, Reliable Spent Fuel Pool Instrumentation," Revision 0:

3.8.3 Reliable Spent Fuel Pool/Buffer Pool Level Instrumentation

Prior to initial fuel load, ~~the following requirements for spent fuel pool/buffer pool level indication will be fully implemented.~~

~~A. The spent fuel pool/buffer pool level instrumentation shall include the following design features:~~

~~1. Power supplies: Instrumentation channels shall provide for power connections from sources independent of the plant alternating current (AC) and direct current (DC) power distribution systems, such as portable generators or replaceable batteries. Power supply designs should provide for quick and accessible connection of sources independent of the plant AC and DC power distribution systems. Onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured.~~

A

~~2. Accuracy: The instrument shall maintain its designed accuracy following a power interruption or change in power source without recalibration.~~

~~B~~. The spent fuel pool/buffer pool instrumentation shall be maintained available and reliable through appropriate development and implementation of a training program. Personnel shall be trained in the use and the provision of alternate power to the safety-related level instrument channels.

~~Within one (1) year after issuance of the Fermi 3 COL, an overall integrated plan shall be submitted to the NRC for review, including a description of how compliance with the requirements described in this license condition will be achieved.~~

~~Initial status reports shall be provided to the NRC sixty (60) days following issuance of the Fermi 3 COL and at six (6) month intervals following submittal of the overall integrated plan described above which delineates progress made in implementing the requirements of this license condition.~~