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DTE Energy

10 CFR 50.55a

October 22, 2013
NRC-13-0058

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Submittal of Inservice Testing Program Relief Request PVRR-001, for the Third Ten-Year Interval

Pursuant to 10 CFR 50.55a(a)(3)(ii), DTE Electric Company (DTE) hereby requests NRC approval of the enclosed relief request, PVRR-001, for the Fermi 2 Power Plant. Relief Request PVRR-001 proposes relief from the component test frequency specifications of the ASME OM Code on the basis that the Code requirement presents an undue hardship without a compensating increase in the level of quality and safety. DTE proposes an alternative consistent with ASME Code Case OMN-20. Approval of the proposed alternative is requested for the remaining duration of the Fermi 2 third IST ten-year interval which started on February 17, 2010. DTE requests NRC approval of this relief request within one calendar year of the date of this letter.

No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact Mr. Zackary Rad of my staff at (734) 586-5076.

Sincerely,

Enclosure: IST Relief Request PVRR-001, ASME OM Code Test Frequencies

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 5, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

Enclosure to
NRC-13-0058

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

IST Relief Request PVRR-001
ASME OM Code Test Frequencies

Relief Request PVRR-001

Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(ii)
Hardship or Unusual Difficulty without a Compensating
Increase in Level of Quality and Safety

1. **ASME Code Component(s) Affected**

   All Pumps and Valves contained within the Inservice Testing Program (IST) scope.

2. **Applicable Code Edition and Addenda**

   ASME OM Code, 2004 Edition (Section IST)

3. **Applicable Code Requirement**

   This request for relief applies to the frequency specifications of the ASME OM Code for all pump and valve testing contained within the IST Program scope per Technical Specification 5.5.6. The applicable ASME OM Code (2004 Edition) sections include the following:

ISTA General Requirements	ISTB Pumps	ISTC Valves	APP. I Safety Relief Valves	APP. II *CVCM
3120	3400 6200	3510 3540 3630 3700 5221 5222 5230 5240 5260	1320 1340 1350 1370 1380 1390	4000

* Check Valve Condition Monitoring Program (CVCM).

4. **Reason for Request**

   Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(ii), relief is requested from the frequency specifications of the ASME OM Code. The basis of the Relief Request is that the Code requirement presents an undue hardship without a compensating increase in the level of quality and safety.

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The ASME OM Code, 2004 Edition, establishes the inservice test frequency for all components within the scope of the Code. The frequencies (e.g., quarterly) have always been interpreted as "nominal" frequencies (generally as defined in Table 3.2 of NUREG 1482, Revision 1) and owners routinely applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TS) Surveillance Requirements (SRs). The TS typically allow for a less than or equal to 25% extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (SR 3.0.2). However, regulatory issues have been raised concerning the applicability of the TS grace period to ASME OM Code required inservice test frequencies.

The lack of a tolerance band (grace period) on the ASME OM Code IST frequency restricts operational flexibility. There may be a conflict where an IST test could be required (i.e., its frequency could expire), but it is not possible or not desired that it be performed until sometime after a plant condition or associated Technical Specification is applicable. Therefore, to avoid this conflict, the IST test intervals should be allowed to be extended by up to 25%.

Thus, just as with TS required surveillance testing, some tolerance is needed to allow adjusting OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. This assures operational flexibility when scheduling IST tests that minimize the conflicts between the need to complete the test and plant conditions.

5. Proposed Alternative and Basis for Use

Code Case OMN-20 is included in the ASME OM Code, 2009 Edition; and will be used as an alternative to the frequencies of the ASME OM Code. The requirements of Code Case OMN-20 are described below.

"ASME OM Division: 1 Section IST and earlier editions and addenda of ASME OM Code specify component test frequencies based either on elapsed time periods (e.g., quarterly, 2 years, etc.) or based on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.).

a. *Components whose test frequencies are based on elapsed time periods shall be tested at the frequencies specified in Section IST with a specified time period between tests as shown in the table below. The specified time period between tests may be reduced or extended as follows:*

    1) *For periods specified as fewer than 2 years, the period may be extended by up to 25% for any given test.*

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2) *For periods specified as greater than or equal to 2 years, the period may be extended by up to 6 months for any given test.*

3) *All periods specified may be reduced at the discretion of the owner (i.e., there is no minimum period requirement).*

Period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used repeatedly merely as an operational convenience to extend test intervals beyond those specified.

Period extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) and other less than two year test frequencies not specified in the table below.

Period extensions may not be applied to the test frequency requirements specified in Subsection ISTD, Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants, as Subsection ISTD contains its own rules for period extensions.

Frequency	***Specified Time Period Between Tests***
Quarterly (or every 3 months)	*92 days*
Semiannually (or every 6 months)	*184 days*
Annually (or every year)	*366 days*
x Years	*x calendar years where 'x' is a whole number of years ≥ 2*

b. *Components whose test frequencies are based on the occurrence of plant conditions or events may not have their period between tests extended except as allowed by ASME OM Division: 1 Section IST 2009 Edition through OMa-2011 Addenda and earlier editions and addenda of the ASME OM Code."*

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6. Duration of Proposed Alternative

This proposed alternative will be used for the remaining duration of the Fermi 2, third ten-year IST interval, which started on February 17, 2010.

7. Precedents

- Three Mile Island Nuclear Station, Unit 1 - Relief Requests PR-01, PR-02, and VR-02, Associated With The Fifth 10-Year Inservice Test Interval (TAC Nos. MF0046, MF0047 and MF0048), dated August 15, 2013. (ADAMS Accession No. ML13227A024)
- Milestone 2 and 3 – Acceptance Review of Alternative Request G-001, Adopt ASME Code Case OMN-20, dated August 13, 2013. (ADAMS Accession No. ML13224A031)
- Callaway Plant, Unit 1 – Summary of Telephone Conference Re: Verbal Authorization for Relief Request PR-07 (TAC No. MF2642), dated September 9, 2013. (ADAMS Accession No. ML13246A307)
- Virgil C. Summer Nuclear Station (VCSNS), Unit1 – Acceptance of Requested Licensing Action Re: Request Relief from ASME Code Requirements in VCSNS 4th Ten Year Inservice Inspection Interval (TAC Nos. MF1900, MF1901, and MF1902)(RC-13-0069), dated July 10, 2013. (ADAMS Accession No. ML13177A099)
- Virginia Electric and Power Company (Dominion) North Anna Power Station Units 1 and 2 ASME Inservice Testing Program for Pumps and Valves Request for Alternative to Requirements of ASME OM Code, Request for Alternative G-1, dated July 17, 2013. (ADAMS Accession No. ML13204A117)
- Virginia Electric and Power Company Surry Power Station Units 1 and 2 ASME Inservice Testing Program for Pumps and Valves Fifth Ten Year interval Update and Associated Relief Requests, dated May 1, 2013. (ADAMS Accession No. ML13128A104)