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10 CFR 2.202

August 28, 2014
NRC-14-0059

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

References:
1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012

3) NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012

4) 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, dated August, 2012

5) DTE Electric Company letter, NRC-12-0063, "Detroit Edison's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated October 19, 2012

6) DTE Electric Company letter, NRC-13-0006, "DTE Electric Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013

Subject: DTE Electric Company Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 2) to DTE Electric Company (DTE). Reference 2 was immediately effective and directed DTE to install reliable spent fuel pool water level indication. Specific requirements are provided in Attachment 2 of Reference 2.

Reference 2 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 3) and an overall integrated plan pursuant to Section IV, Condition C. Reference 3 endorses industry guidance document NEI 12-02, Revision 1 (Reference 4) with clarifications and exceptions identified in Reference 3. Reference 5 provided the DTE initial status report regarding spent fuel pool instrumentation. Reference 6 provided the DTE overall integrated plan.

Reference 2 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 4 provides direction regarding the content of the status reports. The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 2, that delineates progress made in implementing the requirements of Reference 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact Mr. Kirk R. Snyder, Manager, Industry Interface at (734) 586-5020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2014

Vito Kaminskas
Site Vice President

Enclosure

cc: Director, Office of Nuclear Reactor Regulation
NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 5, Region III
Regional Administrator, Region III
Michigan Public Service Commission
Regulated Energy Division (kindschl@michigan.gov)

Enclosure to
NRC-14-0059

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

DTE Electric Company's Third Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation

DTE Electric Company's Third Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation

1 Introduction

DTE Electric Company (DTE) developed an Overall Integrated Plan (Reference 6), documenting the requirements to install reliable spent fuel pool level instrumentation (SFP LI), in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

Modification design engineering has been completed.

3 Milestone Schedule Status

The following provides a milestone schedule to support the Overall Integrated Plan. This section provides the activity status of each item, and the expected completion date. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status
Submit 60 Day Status Report	Oct 2012	Complete (Reference 5)
Submit Overall Integrated Plan	Feb 2013	Complete (Reference 6)
Submit Response to Request for Additional Information (RAI)	Aug 2013	Complete (Reference 7)
Submit 6 Month Updates:		
Update 1	Aug 2013	Complete (Reference 8)
Update 2	Feb 2014	Complete (Reference 9)
Update 3	Aug 2014	Complete
Update 4	Feb 2015	Not Started

Milestone	Target Completion Date	Activity Status
Update 5	Aug 2015	Not Started
Modifications:		
Design Engineering	Jul 2014	Complete
Implementation	Nov 2015	Started
Procedures:		
Create Procedures	Nov 2015	Started
Training:		
Develop Training Plan	Oct 2015	Started
Training Complete	Nov 2015	Not Started
SFP LI Implementation	Nov 2015	Not Started
Submit Completion Report	Jan 2016	Not Started

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 6).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

DTE expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

Reference 7 provided a response to NRC Requests for Additional Information (RAI) regarding the Overall Integrated Plan (Reference 6). In Reference 10, the NRC provided an Interim Staff Evaluation (ISE) of the Overall Integrated Plan and the DTE responses to the RAIs (Reference 7). In the ISE, the NRC identified RAIs which require answers to allow completion of the NRC staff review. In Reference 11, the NRC announced that the review of Overall Integrated Plans would be conducted through an audit process and that responses to the RAI should be provided on each licensee's ePortal. Accordingly, Fermi 2 RAI responses will be provided to the ePortal in support of the audit process. The audit process supersedes the response schedules provided in previous submittals.

7 References

1. Fermi 2
   NRC Docket No. 50-341
   NRC License No. NPF-43
2. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.
3. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
4. 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, dated August, 2012
5. DTE Electric Company letter, NRC-12-0063, "Detroit Edison's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated October 19, 2012
6. DTE Electric Company letter, NRC-13-0006, "DTE Electric Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013.
7. DTE Electric Company letter, NRC-13-0042, "Response to Request for Additional Information (RAI) Regarding the Overall Integrated Plan in Response to Order EA-12-051 'Reliable Spent Fuel Pool Instrumentation'," dated August 19, 2013
8. DTE Electric Company letter, NRC-13-0043, "DTE Electric Company First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated August 26, 2013
9. DTE Electric Company letter, NRC-14-0001, "DTE Electric Company Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 27, 2014
10. NRC letter, "Fermi 2 -Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0771)," dated November 21, 2013
11. NRC letter, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," dated March 26, 2014