



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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October 20, 2014

Mr. Vito Kaminskas
Site Vice President - Nuclear Generation
DTE Electric Company
Fermi 2 - 280 OBA
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
FERMI 2, LICENSE RENEWAL APPLICATION – SET 2 (TAC NO. MF4222)

Dear Mr. Kaminskas:

By letter dated April 24, 2014, DTE Electric Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, to renew the operating license NPF-43 for Fermi 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Ms. Lynne Goodman, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3301 or e-mail Daneira.Melendez-Colon@nrc.gov.

Sincerely,

/RA/

Daneira Meléndez-Colón, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:
Requests for Additional Information

cc w/encl: Listserv

Mr. Vito Kaminskas
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**FERMI 2
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION SET 2
(TAC NO. MF4222)**

RAI 2.1-1

Background:

10 CFR 54.4, "Scope," states, in part:

(a) Plant systems, structures and components [SSCs] within the scope of this part are –

(1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions – (i) the integrity of the reactor coolant pressure boundary; (ii) the capability to shut down the reactor and maintain it in a safe shutdown condition; or (iii) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11, as applicable.

(2) All nonsafety-related systems, structures and components whose failure could prevent satisfactory accomplishment of any of the functions identified in (a)(1)(i), (ii), or (iii) of this section.

LRA Section 2.1.1.2.2(1), "Nonsafety-Related SSCs Directly Connected to Safety-Related SSCs," states that nonsafety-related SSCs attached to safety-related SSCs [structures and components] are in the scope of license renewal in accordance with 10 CFR 54.4(a)(2) up to the first seismic (or equivalent) anchor or alternative bounding criteria, past the safety-related/nonsafety-related interface.

LRA Section 2.1.1.2.2(2)(c), "Spray or Leakage," states that a nonsafety-related SSC with the potential for spray or leakage that could prevent safety-related SSCs from performing their required safety function is within the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(2) and is that portion of the nonsafety-related SSC contained in the same space as the safety-related SSC.

Issue:

During the on-site scoping and screening methodology audit the staff reviewed the implementing document used by the applicant to identify nonsafety-related SSCs with the potential to affect safety-related SSCs, for inclusion within the scope of license renewal. The applicant's implementing document states that only nonsafety-related SSCs that had not been

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included within the scope of license renewal based on the potential for spray or leakage needed to be reviewed for nonsafety-related SSCs directly attached to safety-related SSCs to identify the portion of the nonsafety-related SSC up to the first anchor, equivalent anchor or bounding condition, past the safety-related/nonsafety-related interface.

During the audit the applicant stated that the implementing document had been followed and that fluid-filled, nonsafety-related SSCs located within the same space as safety-related SSCs, were included within the scope of license renewal. However, for fluid-filled nonsafety-related SSCs that were also attached to safety-related SSCs, the staff did not have sufficient information to determine how the applicant had identified the portion of the nonsafety-related SSC past the safety-related/nonsafety-related interface to be included within the scope of license renewal, up to and including an anchor, equivalent anchor or bounding condition.

Request:

The staff requests that the applicant provide a basis for identifying the portions of nonsafety-related SSCs attached to safety-related SSCs up to and including an anchor, equivalent anchor or bounding condition, and including these portions within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

RAI 2.1-2

Background:

10 CFR 54.4, "Scope," states, in part:

(a) Plant systems, structures and components [SSCs] within the scope of this part are –

(1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions – (i) the integrity of the reactor coolant pressure boundary; (ii) the capability to shut down the reactor and maintain it in a safe shutdown condition; or (iii) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11, as applicable.

(2) All nonsafety-related systems, structures and components whose failure could prevent satisfactory accomplishment of any of the functions identified in (a)(1)(i), (ii), or (iii) of this section.

Issue:

During the on-site scoping and screening methodology audit the staff reviewed the license renewal application, license renewal implementing documents, current licensing basis

documentation and performed a walkdown of site structures. The staff determined that the outage building, immediately adjacent to, and in contact with, the reactor building (included within the scope of license renewal in accordance with 10 CFR 54.4(1)), in which personnel perform activities required prior to entry into the reactor building and following exit from the reactor building, was not included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

Request:

The staff requests that the applicant provide a basis for not including the outage building, which is located adjacent to, and in contact with, the reactor building, within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). If an analysis is cited as the basis for not including the outage building within the scope of license renewal, indicate how the analysis considers the effects of aging.