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DTE Energy

December 18, 2014
NRC-14-0075

10 CFR 2.202

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-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions" dated June 6, 2013 (Accession No. ML13130A067)

3) NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis Events," Revision 0, dated November 14, 2013 (Accession No. ML13304B836)

4) NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 7, 2013. (Accession No. ML13316A853)

5) DTE Electric Company letter, NRC-14-0043, "DTE Electric's Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014 (Accession No. ML14182A203)

Subject: DTE Electric Company's First Six Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Order Number EA-13-109)

On June 6, 2013, 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 a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris. Specific requirements are provided in Attachment 2 of Reference 2.

Reference 2 required submission of a Phase 1 Overall Integrated Plan pursuant to Section IV, Condition D.1. Reference 3 endorses industry guidance document NEI 13-02, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 3. Reference 5 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. References 3 and 4 provide direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition D.3, of Reference 2, that delineates progress made in implementing the requirements of Reference 2. Enclosure 1 provides an update of milestone accomplishments since the submittal of Reference 5, 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. Kevin Burke, Manager, Industry Interface at (734) 586-5148.

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

Executed on December 18, 2014

Kent C. Scott
Director – Work Management
For Vito A. Kaminskas

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-14-0075

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

DTE Electric Company's First Six Month Status Report for the Implementation of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions

DTE Electric Company's First Six Month Status Report for the Implementation of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions

1. Introduction

DTE Electric Company (DTE) developed an Overall Integrated Plan (OIP) (Reference 8.1), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 8.2. This enclosure provides an update of milestone accomplishments since submittal of the Phase 1 OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

None

3. Milestone Schedule Status

The following provides an update to the milestone schedule to support the Overall Integrated Plan. Target completion dates provided in this section include updates from 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	Comments
Phase 1 HCVS Milestone Table			
Submit Overall Integrated Plan	Jun 2014	Complete	
Submit 6 Month Updates:			
Update 1	Dec 2014	Complete	
Update 2	Jun 2015	Not Started	
Update 3	Dec 2015	Not Started	
Update 4	Jun 2016	Not Started	
Update 5	Dec 2016	Not Started	
Modifications:			
Hold preliminary/conceptual design meeting	Jun 2014	Complete	
Design Change Package issued for Cycle 17/RF17	Mar 2015	In progress	See Note.
Design Change implementation Cycle 17	Aug 2015	Not Started	

Milestone	Target Completion Date	Activity Status	Comments
Design Change implementation RF17	Nov 2015	Not Started	
Design Change Package issued for RF18	Mar 2016	Not Started	
Design Change implementation RF18	Apr 2017	Not Started	
Walk Through Demonstration/Functional Test	Jun 2017	Not Started	
Procedure Changes			
Operations Procedure Changes Developed	Dec 2016	Not Started	
Site Specific Maintenance Procedure Developed	Dec 2016	Not Started	
Procedure Changes Active	May 2017	Not Started	
Training:			
Training Complete	Feb 2017	Not Started	
Completion			
HCVS Implementation	Apr 2017	Not Started	
Submit Completion Report	Jun 2017	Not Started	

Note: Design package for original scope was issued in September 2014. Following submittal of the OIP, some RF18 scope was rescheduled into RF17. Design package for rescheduled scope to be issued in March 2015. The revised milestone target completion date does not impact the order implementation date.

4. Changes to Compliance Method

No changes in the compliance method for Fermi 2 have been made since the submittal of the phase 1 Overall Integrated Plan.

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 Interim Staff Evaluation (ISE)

The following table provides a summary of the open items documented in the Phase 1 Overall Integrated Plan and the status of each item.

Overall Integrated Plan Phase 1 Open Item	Status
1. Confirm thermal environment for actions using Gothic.	Evaluations of the thermal environment using Gothic are on-going.
2. Confirm radiological environment	Evaluation of the radiological environment is on-going.
3. Confirm suppression pool heat capacity.	Existing suppression pool heat capacity calculations are being reviewed and revised as needed.
4. Define tornado missile protection for Reactor Building 5th floor (RB5) components.	Review of tornado missile protection methods for RB5 components is in-progress.

After the ISE is issued by the NRC, the status of ISE open items will be provided in future six-month updates.

7. Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8. References

The following references support the updates to the Phase 1 Overall Integrated Plan described in this enclosure:

8.1 DTE Electric Company letter, NRC-14-0043, "DTE Electric's Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014

8.2 Order Number EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions" dated June 6, 2013.

8.3 NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013.

8.4 NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).