UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 22, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 13, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE FERMI 2 LICENSE RENEWAL APPLICATION (TAC NO. MF4222)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or the applicant) held a telephone conference call on February 13, 2015, to discuss and clarify the staff's draft request for additional information (DRAI) B.1.1-1a concerning the Fermi 2 license renewal application. The telephone conference call was useful in clarifying the intent of the staff's DRAI.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains the DRAI discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/

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

Docket No. 50-341

Enclosures:
1. List of Participants
2. Summary of Telephone Conference Call

cc w/encls: Listserv

April 22, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 13, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE FERMI 2 LICENSE RENEWAL APPLICATION (TAC NO. MF4222)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or the applicant) held a telephone conference call on February 13, 2015, to discuss and clarify the staff's draft request for additional information (DRAI) B.1.1-1a concerning the Fermi 2 license renewal application. The telephone conference call was useful in clarifying the intent of the staff's DRAI.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains the DRAI discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/

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

Docket No. 50-341

Enclosures:
1. List of Participants
2. Summary of Telephone Conference Call

cc w/encls: Listserv

DISTRIBUTION: See next page

ADAMS Accession No.: ML15076A468 *Concurred via e-mail

OFFICE	LA:RPB1:DLR	PM:RPB1:DLR	PM:RPB1:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	YEdmonds	DMeléndez-Colón	JDaily	YDiaz-Sanabria	DMeléndez-Colón
DATE	4/14/15	4/16/15	4/1715	4/ 22/15	4/ 22/15

OFFICIAL RECORD COPY

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 13, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE FERMI 2 LICENSE RENEWAL APPLICATION (TAC NO. MF4222)

DISTRIBUTION:

E-MAIL:
PUBLIC
RidsNrrDlr Resource
RidsNrrDlrRpb1 Resource
RidsNrrDlrRpb2 Resource
RidsNrrDlrRerb Resource
RidsNrrDlrRarb Resource
RidsNrrDlrRasb Resource
RidsNrrDlrRsrg Resource
RidsNrrPMFermi2 Resource

D. Melendez-Colon
Y. Diaz-Sanabria
E. Keegan
B. Wittick
B. Harris, OGC
D. Roth, OGC
M. Kunowski, RIII
B. Kemker, RIII
V. Mitlyng, RIII
P. Chandrathil, RIII

TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
FEBRUARY 13, 2015

PARTICIPANTS	AFFILIATIONS
Daneira Meléndez-Colón	U.S. Nuclear Regulatory Commission (NRC)
Christopher Hovanec	NRC
Lynne Goodman	DTE Electric Company (DTE)
John Tibai	DTE
Kevin Lynn	DTE
Marc (Al) Brooks	DTE
Rich McGee	DTE

ENCLOSURE 1

SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
FEBRUARY 13, 2015

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or the applicant) held a telephone conference call on February 13, 2015, to discuss and clarify the following draft request for additional information (DRAI) concerning the Fermi 2 license renewal application (LRA).

DRAI B.1.1-1a

Background:

In request for additional information (RAI) B.1.1-1 dated December 17, 2014, the staff requested that DTE state how the aging effects of loss of material and cracking of the aluminum in the proximity of the interface between the condensate storage tank (CST) and its concrete foundation will be managed during the period of extended operation.

In its response dated January 20, 2015, DTE stated that the insulation on the CST prevents access to the interface between the tank and its concrete foundation and is expected to prevent the intrusion of water and moisture. License Renewal Application Sections A.1.1, A.4, and B.1.1 were revised to perform a volumetric examination consisting of four 1-foot sections of the tank/concrete interface prior to entering the period of extended operation. The RAI response also stated that although caulking was not included in the design and installation specifications for the CST there appears to be caulking present at some locations along the tank/concrete interface.

Issue:

The RAI response did not provide a basis for why the applicant expects that the insulation will prevent access to the tank/concrete interface and prevent loss of material from occurring during the period of extended operation. It is unclear to the staff how the configuration of the tank and insulation preclude the possibility of water and moisture intrusion in the outdoor environment/weather. If the interface is not appropriately protected from water and moisture intrusion the partially present caulk may potentially act to trap moisture that has intruded. If a one-time volumetric examination is conducted to demonstrate that aging effects are being effectively managed, then the examination is to be of a representative area. Based on its review, the staff has concluded that four 1-foot sections do not constitute a representative sample size for this type of inspection. License Renewal Interim Staff Guidance (LR-ISG)-2012-02, “Aging Management of Internal Surfaces, Fire Water Systems, Atmospheric Storage Tanks, and Corrosion Under Insulation,” Aging Management Program (AMP) XI.M29, “Aboveground Metallic Tanks,” provides examples of representative sample sizes.

Request:

1. Provide the basis and justification for why the insulation on the CST will prevent the access of water and moisture to the tank/concrete interface and is an appropriate preventive action to manage loss of material during the period of extended operation. The response should include:

    - the intended function of the insulation on the CST

    - a physical description or drawing of the insulation relative to the tank/concrete interface. The level of detail in the description should provide for an understanding of how the configuration of the tank and insulation preclude the possibility of water and moisture intrusion in the outdoor environment/weather. The description should include relevant dimensions

    - an estimate (both total length and percentage) of how much of the tank/concrete interface has the preexisting caulking present to potentially entrap water and moisture

2. If the one-time volumetric inspection is being performed to demonstrate the effectiveness of the insulation in preventing moisture intrusion at the tank/concrete interface, instead of establishing the general condition of the tank prior to entering the period of extended operation, state and justify the basis used to determine that four 1-foot sections of the tank/concrete interface is a representative sample.

Discussion:

The applicant stated that the tank insulation does not prevent moisture intrusion and is not credited for preventing moisture intrusion.

The applicant also stated that they will consider the following:

- Credit the caulk as a moisture barrier and re-caulk the bottom of the tank to prevent moisture intrusion. The caulk would be subject to reoccurring inspections if credited.

- Assuming water could get to the interface, perform reoccurring volumetric inspections from the inside of the tank to evaluate the concrete/aluminum interface for loss of material. The inspections from the inside of the tank would be of a representative sample of locations and specifically target the area of interest. Additionally, a limited number of inspections would be performed from the outside of the tank as partially discussed in the response to the initial RAI. The details (inspection method, frequency, and extent) for the proposed internal and external inspections would be provided.

The staff provided clarification related to its request in draft RAI B.1.1-1a and stated it will revise the request as follows:

1. If the tank insulation is being credited as a moisture barrier or preventive measure, provide the basis and justification for why the insulation on the CST will prevent the access of water and moisture to the tank/concrete interface and is an appropriate preventive action to manage loss of material during the period of extended operation. The response should include:

    - the intended function of the insulation on the CST

    - a physical description or drawing of the insulation relative to the tank/concrete interface. The level of detail in the description should provide for an understanding of how the configuration of the tank and insulation preclude the possibility of water and moisture intrusion in the outdoor environment/weather. The description should include relevant dimensions. This description is only needed if the tank insulation is being credited as a preventive measure against loss of material at the tank/concrete interface.

    - an estimate (both total length and percentage) of how much of the tank/concrete interface has the preexisting caulking present to potentially entrap water and moisture. Clarify if the caulking will remain in a partially present condition during the period of extended operation.

    - if caulking is credited as a preventive measure, clarify if it will be inspected in accordance with Generic Aging Lessons Learned (GALL) Report AMP XI.M29, as modified by LR-ISG-2012-02.

2. If the one-time volumetric inspection is being performed to demonstrate the effectiveness of the insulation in preventing moisture intrusion at the tank/concrete interface, instead of establishing the general condition of the tank prior to entering the period of extended operation, state and justify the basis used to determine that four 1-foot sections of the tank/concrete interface is a representative sample. If an alternate inspection is being used to manage the loss of material in the proximity of the tank/concrete interface, provide the basis and justification for the inspection method, extent of inspection, and frequency of inspection.

The applicant understands the staff's concerns and will provide a response to the draft RAI.

The RAI will be issued as revised.