



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

March 26, 2015

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 27 (TAC NO. MF4222)

Dear Mr. Kaminskas:

By letter dated April 24, 2014, DTE Electric Company (DTE or the applicant) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* 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 40 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

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**FERMI 2
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION SET 27
(TAC NO. MF4222)**

RAI B.1.45-1

Background:

As amended by letter dated February 5, 2015, License Renewal Application (LRA) Section B.1.45 states an exception to the “corrective actions” program element. The exception states that the high pressure coolant injection (HPCI) system lube oil reservoir internal coating will not be repaired or replaced and cites Nuclear Maintenance Applications Center Terry Turbine Users Group recommendations as a basis.

Issue:

The staff noted that Electric Power Research Institute (EPRI) Technical Report (TR) 1007459, “Terry Turbine Maintenance Guide, HPCI Application,” November 2002, Section 20.2.5, “Inspection and Maintenance,” states, “[r]emove any damaged preservative paint coating. Do not attempt to repaint the surfaces of the oil reservoir.” The exception states that coatings will not be replaced or repaired, while Technical Report 1007459 states that damaged preservative coatings should be removed. The staff does not take issue with the provision to not repaint the internal surfaces of the lube oil reservoir. However the staff lacks sufficient information to conclude that the HPCI turbine will be capable of performing its intended function if degraded coatings are present.

Request:

State what actions would be taken to mitigate potential further degradation of degraded coatings on the internal surfaces of the HPCI system lube oil reservoir.

RAI B.1.45-2

Background:

As amended by letter dated February 5, 2015, LRA Section B.1.45 states exceptions to the “corrective actions” program element. The exceptions state that when delamination, peeling, or blistering is detected during coating inspections and the coatings will be returned to service, physical testing will consist of lightly tapping the coating, light hand scraping, light power tool cleaning, or adhesion testing. The exception also states that destructive adhesion testing will not be conducted. The exception further states that longer followup and re-inspection inspection intervals than those recommended in Aging Management Program (AMP) XI.M42, “Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks,” would be allowed as long as they were technically justified.

ENCLOSURE

Issue:

The “corrective actions” program element of AMP XI.M42 recommends that where adhesion testing is not possible due to physical constraints alternative means of physical testing such as those described by the applicant would be acceptable. However, the exception does not limit these alternative methods to instances where adhesion testing is not possible. There are nondestructive adhesion tests which can be conducted; therefore, the justification for the exception is not sufficient because it is based on the conclusion that coatings would be removed down to the base metal if adhesion testing is conducted. In addition, no basis was provided for inspection intervals beyond those recommended in the “acceptance criteria” program element of AMP XI.M42, beyond stating that a future evaluation would be conducted.

Request:

State: (a) why nondestructive adhesion testing cannot be performed when coatings are returned to service with delamination, peeling or blisters; (b) how lightly tapping the coating, light hand scraping, light power tool cleaning will be controlled (e.g., procedures, method qualification) such that consistent results can be obtained if nondestructive adhesion testing will not be performed; and (c) the basis and justification for any inspection intervals beyond those in the “acceptance criteria” program element of AMP XI.M42.

RAI B.1.45-3

Background:

As amended by letter dated February 5, 2015, LRA Section A.1.45 provides the Updated Final Safety Analysis Report (UFSAR) supplement for the Coating Integrity Program. It states in part, “[b]aseline coating/lining inspections will occur in the 10-year period prior to the period of extended operation. Subsequent inspections are based on an evaluation of the effect of a coating/lining failure on in scope component intended functions, potential problems identified during prior inspections, and service life history.”

Issue:

The AMP XI.M42 “detection of aging effects” program element makes virtually the same statement; however, it expands on the statement by stating, “inspection intervals should not exceed that in Table 4a, ‘Inspection Intervals for Internal Coatings/Linings for Tanks, Piping, Piping Components, and Heat Exchangers.’” The staff noted that based on the proposed wording in the UFSAR supplement subsequent inspections may not occur on recommended intervals or may not occur at all.

Request:

State and justify the criteria that will be used to determine the maximum duration between coating inspections.