



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

April 27, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MARCH 16, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION, SET 27 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 March 16, 2015, to discuss and clarify the staff's draft requests for additional information (DRAIs) B.1.45-1, B.1.45-2, and B.1.45-3 concerning the Fermi 2 license renewal application. The telephone conference call was useful in clarifying the intent of the staff's DRAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the DRAIs 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

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TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
MARCH 16, 2015

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SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
MARCH 16, 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 March 16, 2015, to discuss and clarify the following draft requests for additional information (DRAIs) concerning the Fermi 2 license renewal application (LRA).

DRAI B.1.45-1

Background:

As amended by letter dated February 5, 2015, 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 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 current licensing basis (CLB) 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 high pressure coolant injection system lube oil reservoir.

Discussion:

The staff provided clarification related to its request in draft RAI B.1.45-1. The applicant stated that its intention is to remove all degraded coating and not replace it.

The applicant understands the staff’s concerns and will provide a response to the RAI when issued.

This request will be sent as a formal RAI.

ENCLOSURE 2

DRAI 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 follow-up 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.

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 AMP XI.M42 Table 4a, “Inspection Intervals for Internal Coatings/Linings for Tanks, Piping, Piping Components, and Heat Exchangers,” 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 AMP XI.M42 Table 4a.

Discussion:

The staff provided clarification related to its request in draft RAI B.1.45-2.

The applicant noted that the recommended inspection intervals are described in the “acceptance criteria” program element and not on Table 4a of AMP XI.M42. The staff stated it will revise the RAI and incorporate this correction.

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

This request will be sent as a formal RAI with the correction noted.

DRAI 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.

Discussion:

The staff provided clarification related to its request in draft RAI B.1.45-3.

The applicant stated that it will provide clarification in the UFSAR supplement regarding inspection intervals.

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

This request will be sent as a formal RAI.