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 NOVEMBER 19, 2014, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION, SET 7 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 November 19, 2014, to discuss and clarify the staff's draft request for additional information (DRAI) B.1.8-2 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

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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	4/15/15	4/16/15	4/17/15	4/ 22 /15	4/ 22/15

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

TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
NOVEMBER 19, 2014

PARTICIPANTS	AFFILIATIONS
Daneira Meléndez-Colón	U. S. Nuclear Regulatory Commission (NRC)
Seung Min	NRC
Lynne Goodman	DTE Electric Company (DTE)
Kevin Lynn	DTE
Al Brooks	DTE

ENCLOSURE 1

SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
NOVEMBER 19, 2014

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 November 19, 2014, to discuss and clarify the following draft request for additional information (DRAI) concerning the Fermi 2 license renewal application (LRA).

DRAI B.1.8-2

Background:

License Renewal Application Section B.1.8 states that the applicant's BWR Stress Corrosion Cracking Program is consistent with Generic Aging Lessons Learned (GALL) Report Aging Management Program (AMP) XI.M7, "BWR Stress Corrosion Cracking." In its review of the applicant's program and related information, the staff noted that the following references indicate that the applicant's condensate and feedwater systems include 24 Category D welds per Generic Letter (GL) 88-01 (i.e., welds with materials non-resistant to intergranular stress corrosion cracking and with no stress improvement process).

- Letter from the Detroit Edison Company to the NRC (NRC-92-0090), Fermi 2 Response to Generic Letter 88-01, Supplement 1, NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping, July 29, 1992

- Letter from the NRC to the Detroit Edison Company, Fermi-2 Removal of 24 Condensate and Feedwater System Welds from the Inservice Inspection Nondestructive Examination (ISI-NDE) Program (TAC No. M84177), December 18, 1992

The staff also noted that the following tables of the LRA describe the applicant's aging management review (AMR) items for the condensate and feedwater systems.

- Table 3.4.2-3-2, "Condensate System, Nonsafety-Related Components Affecting Safety-Related Systems"

- Table 3.4.2-2, "Feedwater and Standby Feedwater System"

- Table 3.4.2-3-3, "Feedwater and Standby Feedwater System, Nonsafety-Related Components Affecting Safety-Related Systems"

Issue:

The staff noted that the AMR tables for the condensate and feedwater systems in the LRA do not include any AMR items to manage IGSCC for the Category D welds that were identified in the 1992 communications between the Detroit Edison Company and NRC. The staff cannot determine the adequacy of the applicant's program and AMR results without additional information to justify the omission of relevant AMR items.

ENCLOSURE 2

The staff also noted that the 1992 communications indicate that these Category D welds are located outboard of the containment isolation valves and at least 10 percent of these welds should be inspected during each refueling outage as part of the applicant's inservice inspection. The staff further noted that the extent and frequency of the application's inspections are different from the inspection guidance provided in GL 88-01 and BWRVIP-75-A. For example, BWRVIP-75-A states that in the case of the implementation of hydrogen water chemistry 100 percent of Category D welds should be inspected every 10 years and at least 50 percent of these welds should be inspected in the first 6 years. However, the LRA does not identify this difference as a program exception.

Request:

1. Explain whether or not the condensate and feedwater systems include Category D welds. Provide adequate justification for why the LRA AMR tables for condensate and feedwater systems do not include AMR items to manage IGSCC for the Category D welds.

2. Clarify why the LRA does not identify the inspection extent and frequency for Category D welds as a program exception to GALL Report AMP XI.M7. In addition, provide technical justification for why the inspection extent and frequency for Category D welds are acceptable for adequate aging management. As part of the response, discuss whether the plant-specific operating experience, including inspection results, justify the adequacy of aging management for Category D welds.

Discussion:

The staff provided clarification related to its concerns in draft RAI B.1.8-2.

The applicant and the staff discussed the inspection scope and the frequency for the Category D welds in the condensate and feedwater systems. The discussion also included the inspection scope per Generic Letter 88-01 for the reactor water cleanup system welds.

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

This request will be sent as a formal RAI.