



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

May 13, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MARCH 25, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUEST FOR ADDITIONAL INFORMATION, SET 31 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 25, 2015, to discuss and clarify the staff's draft request for additional information (DRAI) B.1.2-2a and the applicant's response to request for additional information (RAI) B.1.22-1 concerning the Fermi 2 license renewal application. The telephone conference call was useful in clarifying the intent of the staff's DRAI and the applicant's response.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains the DRAI and RAI response 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 25, 2015

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SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
MARCH 25, 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 25, 2015, to discuss and clarify the following draft request for additional information (DRAI) and request for additional information (RAI) response concerning the Fermi 2 license renewal application (LRA).

DRAI B.1.2-2a

Background:

Licensed Renewal Application Section B.1.2 states that the Bolting Integrity Program is an existing program, with enhancements, that will be consistent with Generic Aging Lessons Learned (GALL) Report Aging Management Program (AMP) XI.M18, "Bolting Integrity." In its response to RAI B.1.2-2, dated January 20, 2015, DTE stated, in part, the following:

Quarterly surveillance runs of the [residual heat removal service water] RHRSW, [emergency equipment service water] EESW, and [emergency diesel generator service water] EDGSW pumps are performed. The pump performance parameters are trended to determine if corrective actions are needed. Pump degradation during surveillance runs would lead to pump repair or refurbishment. During this maintenance, the associated bolting would be inspected, including the bolting threads. To ensure that loss of material in crevice locations that are not readily visible can be detected, the LRA will be revised to include these opportunistic inspections of the submerged bolting threads as part of the Bolting Integrity Program.

Issue:

GALL Report AMP XI.M18 recommends periodic inspections (at least once per refueling cycle) of closure bolting for signs of leakage to ensure the detection of age-related degradation due to loss of material and loss of preload. The staff notes that a submerged environment limits the ability to detect leakage of submerged bolted connections. Therefore, additional information is needed for the staff to understand how the Bolting Integrity Program will ensure the detection of loss of material and loss of preload, and an adequate aging management of bolts in the RHRSW, EESW, and EDGSW systems submerged environment.

The Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP-LR) states that the AMP frequency of inspections may be linked to plant specific or industry wide operating experience and a discussion should provide justification that the frequency is adequate to detect the aging effects before there is a loss of structure and component (SC) intended function. The SRP-LR also states that the detection of aging effects should occur before there is a loss of SC intended function. The staff is concerned about the

ENCLOSURE 2

possibility that an opportunistic inspection approach may result in inspections not done frequently enough to detect degradation of the bolt thread area of the submerged bolts before there is a loss of intended function. Therefore, it is not clear how opportunistic inspections based on pump maintenance activities will be adequate to detect loss of material in the thread region of the submerged bolts before there is a loss of intended function.

Request:

1. Provide the number of times (including year) that degradation during surveillance runs led to maintenance (e.g., pump repair or refurbishment) for the RHRSW, EESW, and EDGSW systems with submerged bolting.
2. Provide the technical basis as to how the opportunistic inspections of the bolting threads will ensure that the aging effects for submerged bolting will be timely detected and adequately managed before there is a loss of intended function.

Discussion:

The applicant requested the staff clarify its request. The staff provided clarification related to its concern in draft RAI B.1.2-2a and stated it will revise the request as follows:

1. Provide the number of times (including year) that maintenance activities (e.g., pump repair or refurbishment) have been performed for the RHRSW, EESW, and EDGSW systems with submerged bolting.
2. Provide the technical basis as to how the proposed inspections will ensure that the aging effects for the threaded area of the submerged bolting will be timely detected and adequately managed before there is a loss of intended function.

This question will be sent as a formal RAI. A mutually agreeable date for the response will be within 30 days from the date of the official letter.

RAI B.1.22-1

Background:

During a conference call held on March 24, 2015, the staff confirmed that the applicant intends to install high strength structural bolts with actual measured yield strength of less than 150 ksi during the period of extended operation consistent with GALL Report AMP XI.S3, "ASME Section XI, Subsection IWF," recommendations.

Discussion:

The applicant stated that it will revise its response to RAI B.1.22-1, dated February 19, 2015, to clarify their intent to install high-strength structural bolts with actual measured yield strength of less than 150 ksi during the period of extended operation with the exception of the bolts currently installed in the reactor pressure vessel skirt to ring girder bolted joint.