



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

May 1, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON
NOVEMBER 25, 2014, BETWEEN THE U.S. NUCLEAR REGULATORY
COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS
FOR ADDITIONAL INFORMATION, SET 9 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 25, 2014, to discuss and clarify the staff's draft requests for additional information (DRAIs) B.1.19-3, B.1.19-4, and B.1.19-8 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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| NAME | YEdmonds | DMeléndez-Colón | JDaily | YDiaz-Sanabria | DMeléndez-Colón |
| DATE | 4/15/15 | 4/16/15 | 4/17/15 | 4/30/15 | 5/1/15 |

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TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
NOVEMBER 25, 2014

PARTICIPANTS

Daneira Meléndez-Colón
William Holston
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Kevin Lynn
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AFFILIATIONS

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SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
NOVEMBER 25, 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 25, 2014, to discuss and clarify the following draft requests for additional information (DRAIs) concerning the Fermi 2 license renewal application (LRA).

DRAI B.1.19-3

Background:

As amended by letter dated July 30, 2014, Enhancement Nos. 2 and 7 to the “parameters monitored or inspected” and “detection of aging effects” program elements of the Fire Water System Program state that an inspection of the wet fire water system piping condition will be conducted at least once every five years by opening a flushing connection at the end of one main drain and by removing a sprinkler toward the end of one branch line.

License Renewal Interim Staff Guidance (LR-ISG)-2012-02 Aging Management Program (AMP) XI.M27 recommends that, as stated in National Fire Protection Association (NFPA) 25 Section 14.2.2, in buildings with multiple wet pipe systems every other system should be inspected every 5 years.

Issue:

During the audit, the applicant confirmed that it has multiple wet pipe systems in buildings with in-scope components protected by the fire water system. The applicant did not provide a basis for why testing only one system every 5 years is sufficient.

Request:

State the basis for why inspecting only one of the wet pipe systems in each building every 5 years will provide reasonable assurance that the wet fire water system piping will be capable of performing its current licensing basis intended function(s) during the period of extended operation.

Discussion:

The staff provided clarification related to its concern in draft RAI B.1.19-3.

The applicant provided clarification related to its definition of multiple wet pipe systems and whether or not there are multiple wet pipe systems within its buildings.

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

This request will be sent as a formal RAI.

DRAI B.1.19-4

Background:

As amended by letter dated July 30, 2014, Enhancement No. 4 to the "detection of aging effects" program element of the Fire Water System Program states that a basis for the acceptance criteria of less than or equal to 25 psig and less than or equal to 10 psig that currently exists in the main drain test procedures will be developed.

LR-ISG-2012-02 AMP XI.M27 recommends that, as stated in NFPA 25 Section 13.2.5.2, a 10 percent reduction on full flow pressure during main drain tests should be corrected.

Issue:

During the audit the staff confirmed that the fire water system header pressure is 150 psig plus or minus 10 psig. While the " ≤ 10 psig" acceptance criterion is less than the 10 percent reduction recommended in NFPA 25 and therefore could be conservative based on the 150 psig header pressure, it is not clear to the staff how a " ≤ 25 psig" criterion can be justified. Although the enhancement states that the basis for the less than or equal to 25 psig and less than or equal to 10 psig criteria will be developed prior to the period of extended operation, the staff cannot complete its review of the Fire Water System Program until it is provided the basis for the acceptance criteria.

Request:

Provide the basis for the acceptance criteria of less than or equal to 25 psig and less than or equal to 10 psig that currently exists in the main drain test procedures.

Discussion:

The staff provided clarification related to its concern in draft RAI B.1.19-4.

The applicant and the staff discussed the acceptance criteria of less than or equal to 25 psig and less than or equal to 10 psig. The discussion also included the recommendations in NFPA 25, "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems."

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

This request will be sent as a formal RAI.

DRAI B.1.19-8

Background:

One of the plant-specific operating experience examples cited in the LRA describes fire suppression flow testing that demonstrated degrading conditions in the underground piping system. The applicant stated that it increased the frequency of testing and evaluation of this piping from 3 years, as required in the current licensing basis, to annual testing.

Issue:

Based on its review of corrective action reports that describe the trend of degradation, it is not clear to the staff why the increased frequency of testing should not be continued during the period of extended operation.

Request:

State the basis for why performing the fire suppression flow test of the underground piping system every 3 years during the period of extended operation will be adequate to detect a decreasing trend prior to the system not being able to perform its current licensing basis intended function.

Discussion:

The staff provided clarification related to its concern in draft RAI B.1.19-8.

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

This request will be sent as a formal RAI.