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 APRIL 10, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION, SET 33 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 April 10, 2015, to discuss and clarify the staff's draft request for additional information (DRAI) 4.1-4a 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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TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
APRIL 10, 2015

PARTICIPANTS	AFFILIATIONS
Daneira Meléndez-Colón	U. S. Nuclear Regulatory Commission (NRC)
James Medoff	NRC
Matthew Hardgrove	NRC
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Kevin Lynn	DTE
Erica Mullen	DTE
Greg Brede	DTE
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ENCLOSURE 1

SUMMARY OF TELEPHONE CONFERENCE CALL
FERMI 2
LICENSE RENEWAL APPLICATION
APRIL 10, 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 April 10, 2015, to discuss and clarify the following draft request for additional information (DRAI) concerning the Fermi 2 license renewal application (LRA).

DRAI 4.1-4a

Background:

The response to Request for Additional Information (RAI) 4.1-4, dated February 5, 2015, states that the standby liquid control (SLC) and core ΔP lines internal to the reactor pressure vessel do not perform a license renewal intended function. A proprietary response to RAI 4.1-4, Part (b), which requested a clarification on whether the current licensing basis included any analyses for the internal portions of the SLC system that would need to be identified as time-limited aging analyses (TLAAs), was also provided.

Issue 1:

Based on information provided in Updated Final Safety Analysis Report (UFSAR) Section 4.5.1.2.11, the staff has concluded that internal portions of the SLC line (i.e., the portions of the line inside of the reactor pressure vessel) need to be included within the scope of the license renewal application in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 54.4(a)(3) for anticipated transients without scram (ATWS) events, as regulated by 10 CFR 50.62.

Request 1:

a. Amend the LRA, as appropriate, to include the internal portions of the SLC line as components that need to be within the scope of license renewal in accordance with 10 CFR 54.4(a)(3) for ATWS events.

b. State the applicable aging effects requiring management that apply to the components and state (with justification) how these aging effects will be managed during the period of extended operation. Otherwise, justify why the applicable aging effects do not need to be age-managed if condition monitoring activities (i.e., inspections) will not be performed on the internal portions of the SLC during the period of extended operation.

Issue 2:

The response to RAI 4.1-4, Part (b), identifies that both an American Society of Mechanical Engineers (ASME) Code fatigue analysis and a vibrational loading analysis were applied to the internal portions of the SLC line. The staff's assessment of the vibrational loading analysis for the internal portions of SLC line will be addressed through the review of the anticipated supplemental response to RAI 4.1-1. Regarding the referenced ASME Code Section III NB-3650 fatigue analysis, the alternating stress range value does not serve as an adequate basis for implying that the analysis does not involve time-limited assumptions defined by the current operating term. Instead, if an ASME Code Section III cumulative usage factor (CUF) analysis was performed for internal portions of the SLC line in accordance with NB-3650 requirements and the analysis is based on the number of cycles assumed for applicable design basis transients during the current 40-year licensing period, the analysis will meet Criterion (3) for TLAAs in 10 CFR 54.3(a) and the analysis does involve time-dependent assumptions defined by the current operating term.

Request 2:

If a CUF analysis has been performed for the internal portions of the SLC lines under the requirements of ASME Code Section III NB-3650, justify why the CUF analysis would not need to be identified as a TLAA analogous to the manner the fatigue analyses for the internal portions of the core spray lines, the jet pump riser braces, the access hole covers, and the jet pump auxiliary spring wedge assemblies have been identified as TLAAs in LRA Table 4.3-3. Alternatively, if the design basis is such that it includes an alternative type of cyclical loading analysis for the internal portions of the SLC lines (e.g., an ASME Code Section III fatigue exemption or waiver analysis or a time-dependent expansion stress and maximum allowable stress range reduction analysis), justify whether the analysis needs to be identified as a TLAA for the LRA, when compared to the six criteria in 10 CFR 54.3(a) for defining TLAAs.

Discussion:

The staff provided clarification related to its request in draft RAI 4.1-4a.

The applicant stated that they do not think that the internal portions of the SLC line (i.e., the portions of the line inside of the reactor pressure vessel) need to be included within the scope of license renewal. The applicant discussed the basis for their position.

Based on the discussion with the applicant, the staff indicated that this question will be deferred for further discussion in a future conference call or a meeting.