



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

June 11, 2015

LICENSEE: DTE Electric Company

FACILITY: Fermi 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MAY 13, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DTE ELECTRIC COMPANY, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION, SET 35 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 May 13, 2015, to discuss and clarify the staff's draft request for additional information (DRAI) 4.3.3-1a 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: Listserv

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TELEPHONE CONFERENCE CALL  
FERMI 2  
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS  
MAY 13, 2015

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SUMMARY OF TELEPHONE CONFERENCE CALL  
FERMI 2  
LICENSE RENEWAL APPLICATION  
MAY 13, 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 May 13, 2015, to discuss and clarify the following draft request for additional information (DRAI) concerning the Fermi 2 license renewal application (LRA).

**DRAI 4.3.3-1a**

Background:

By letter dated January 14, 2015, the staff issued Request for Additional Information (RAI) 4.3.3-1 requesting that the applicant:

- (1) Provide the methodology being used to identify plant-specific component locations in the reactor coolant pressure boundary that are more limiting than the components identified in NUREG/CR-6260.
- (2) Provide the technical basis used to determine that the methodology used to identify the plant-specific component locations are bounding.

In its response dated February 12, 2015, the applicant stated that:

- (1) Electric Power Research Institute (EPRI) Technical Report 1024995, "Environmentally Assisted Fatigue Screening, Process and Technical Basis for Identifying EAF Limiting Locations" is the methodology that will be used to identify plant-specific component locations that are more limiting than the locations identified in NUREG/CR-6260.
- (2) EPRI Technical Report 1024995, Section 3, provides the technical basis for the methodology to identify the limiting plant-specific component locations.

Section 3 of EPRI Technical Report 1024995 states: "The reader is reminded that this report is NOT provided as a Quality Assured document. Application of the processes described will require appropriate review and quality dedication on a site-specific basis."

Section 4 of EPRI Technical Report 1024995 contains a subsection entitled "Guidelines for Reducing the Number of Sentinel Locations." This subsection provides possible criteria that could be used to make judgements regarding the reduction of sentinel locations. Section 6 also states that analysis beyond the scope of the screening process presented may be applied to further reduce the number of sentinel locations.

ENCLOSURE 2

Issue:

EPRI Technical Report 1024995 has not been submitted to the NRC for approval and has not been endorsed by the NRC. Additionally, EPRI Technical Report 1024995 is not a Quality Assured document and its application requires plant-specific review. The criteria used to reduce the number of sentinel locations are not clearly defined. The applicant has not demonstrated that its application of EPRI Technical Report 1024995 will be done in a manner that conservatively evaluates environmentally assisted fatigue (EAF) effects, with the same degree of analytical rigor for all locations, to identify the bounding locations.

The staff lacks sufficient information to evaluate the effects of the reactor coolant environment on component fatigue life during the period of extended operation. It is unclear to the staff if the plant-specific implementation of the generic procedures in EPRI Technical Report 1024995 will identify the most limiting plant-specific locations.

Request:

- (1) Describe and justify the site-specific review that was conducted to determine that the application of the processes described in EPRI Technical Report 1024995 is appropriate for identifying the EAF limiting locations. Describe and justify the site-specific quality dedication processes associated with the application of the screening methodology.
- (2) Select a number of representative systems and provide the evaluation of the EAF analysis, ranking of sentinel locations, and selection of limiting sentinel locations. The systems should be selected so that they demonstrate the adequacy of the methodology to identify the limiting plant-specific component locations. Consideration should be given to the thermal zones, materials, transients, and complexity of the systems selected. The systems selected should demonstrate that the methodology conservatively evaluates EAF effects, with the same degree of analytical rigor for all locations, to identify the bounding locations.
- (3) Describe and justify any engineering judgement, plant-specific assumptions, and plant-specific criteria used in the EAF analysis or screening process. This should include the systematic process used to eliminate sentinel locations as limiting and examples showing how the process was implemented.
- (4) If analysis beyond the scope of EPRI Technical Report 1024995 is being used to reduce the number of sentinel locations or aid in the selection of sentinel locations, describe and justify use of the analysis. If any aspect of EPRI Technical Report 1024995 is not being used, identify and justify these aspects.

Discussion:

The staff provided clarification related to its concern in draft RAI 4.3.3-1a.

The applicant provided clarification related to the quality assurance process associated with the screening methodology.

The staff stated that for Request (2), it needs enough information to ensure that the methodology used by the applicant is reasonable and conservative, and that it demonstrates a range of different cases. The applicant stated that it did not use thermal zones.

The staff stated that the intent of Request (4) is **not** to compare the methodology used by the applicant to EPRI Technical Report 1024995.

The staff stated that it will revise the DRAI to more clearly state the information needed to complete its review.

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

The revised request will be sent as a formal RAI.