SUMMARY OF TELECONFERENCE CALL
FERMI2
LICENSE RENEWAL APPLICATION
JUNE 9, 2016

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of DTE Electric Company (DTE or applicant) held a telephone conference call on June 9, 2016, to discuss and clarify the staff's understanding of DTE's "Fermi 2 License Renewal Application 2016 Annual Update" (Agencywide Document Access and Management System (ADAMS) Accession No. ML16165A442), specifically the scoping and screening of a recently installed system, "Beyond Design Basis External Event Mitigation (Fukushima)." This new system is intended to be used as part of the Flexible and Diverse Coping (FLEX) to mitigate Beyond Design Basis External Events (BDBEE) in response to NRC Order EA-12-049, "Issuance of Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735).

By letter dated May 9, 2016, DTE submitted its annual update to the Fermi 2 license renewal application (LRA), "Fermi 2 License Renewal Application 2016 Annual Update," in accordance with Title 10 of the Code of Federal Regulations (CFR) Section 54.21(b). As part of the Fermi 2 response to NRC Order EA-12-049 regarding the events at Fukushima, a new system, BDBEE Mitigation (Fukushima), was installed. The components associated with this system are for responding to BDBEE and are nonsafety-related. The new system contains cross-connections into existing plant systems such as the residual heat removal (RHR) and high pressure coolant injection (HPCI) systems. Due to these connections, DTE determined that some components in the BDBEE Mitigation (Fukushima) system have a license renewal intended function per 10 CFR 54.4(a)(2).

The NRC staff reviewed the Fermi 2 LRA 2016 Annual Update and the updated final safety analysis report (UFSAR) drawings included with the May 26, 2016, letter submittal of "Fermi, Unit 2, Submittal of Revision 20 Updated Final Safety Analysis Report, 10CFR50.59 and 10CFR72.48 Evaluation Summary Reports, Commitment Management Report & Revisions to Technical Requirements Manual & Technical Specifications Bases, and a Summary of the Excessive Detail Removed from the UFSAR." On June 9, 2016, the NRC staff held a teleconference with the applicant to confirm the staff's understanding of the license renewal boundaries.

The staff asked DTE to confirm the boundary between the safety- and nonsafety-related portions of the RHR and HPCI systems. The applicant stated that, in UFSAR Figures 5.5-13, Sheets 1 and 2, corresponding with LRA Drawings M-2083 and M-2084 respectively, the LRA boundary between the safety-related RHR system and nonsafety-related BDBEE Mitigation (Fukushima) system changes at the inlet side of valves F621A and F621B. The piping and components downstream of these boundary valves, including the boundary valves, as seen in LRA drawings M-2083 and M-2084,are subject to the same Aging Management Program (AMP) as the RHR piping and components. The piping and components upstream of the boundary valves are subject to the summary of aging management evaluation in Table 3.3.2-17-37, "BDBEE Mitigation (Fukushima) System Nonsafety-Related Components Affecting Safety-Related Systems Summary of Aging Management Evaluation."

Regarding the FLEX piping connected to the HPCI test line piping as seen in UFSAR Figure 7.3-1, sheet 1, the applicant informed the NRC staff that the new piping up to and including valves E4100F230 and E4100F231 are in scope of aging management evaluation in Table 3.4.2-2 while the remaining piping and valves related to this modification are in scope of aging management evaluation in Table 3.3.2-17-37.