



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

November 29, 2017

Mr. Keith J. Polson
Senior Vice President and
Chief Nuclear Officer
DTE Electric Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMIS 2 - ISSUANCE OF AMENDMENT TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-545, REVISION 3, "TS INSERVICE TESTING PROGRAM REMOVAL & CLARIFY SR USAGE RULE APPLICATION TO SECTION 5.5 TESTING" (CAC NO. MF8262, EPID L-2016-LLA-0006)

Dear Mr. Polson:

The U.S. Nuclear Regulatory Commission (NRC or Commission) has issued the enclosed Amendment No. 207 to Renewed Facility Operating License No. NPF-43 for the Fermi 2 facility. The amendment is in response to your application dated July 25, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16207A433) and as supplemented by letter dated August 15, 2017 (ADAMS Accession No. ML17228A082).

The amendment eliminates the technical specification (TS) 5.5.6, "Inservice Testing and Inspection Program," to remove requirements duplicated in American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), Case OMN-20, "Inservice Test Frequency" and in ASME Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."

A new defined term, "INSERVICE TESTING PROGRAM," is added to TS Section 1.1, "Definitions" and references to the program are modified to refer to the new definition.

The proposed amendment also modifies Section 5.5.4, "Radioactive Effluent Controls Program," to clarify that surveillance requirements 3.0.2 and 3.0.3 are applicable to the requirements for that program contained in the Offsite Dose Calculation Manual.

A copy of our safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Sujata Goetz". The signature is fluid and cursive, with a large initial "S" and "G".

Sujata Goetz, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures:

1. Amendment No. 207 to NPF-43
2. Safety Evaluation

cc w/encls: Distribution via Listserv



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

DTE ELECTRIC COMPANY

DOCKET NO. 50-341

FERMI 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 207
License No. NPF-43

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the DTE Electric Company (DTE, the licensee) dated July 25, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16207A433) and as supplemented by letter dated August 15, 2017 (ADAMS Accession No. ML17228A082) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

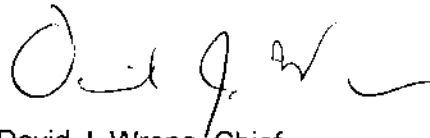
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-43 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 207, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed license. DTE Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 120 days.

FOR THE NUCLEAR REGULATORY COMMISSION



David J. Wrona, Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: November 29, 2017

ATTACHMENT TO LICENSE AMENDMENT NO. 207

FACILITY OPERATING LICENSE NO. NPF-43

DOCKET NO. 50-341

Replace the following pages of the Facility Operating License and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

4

4

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

1.1-3

1.1-3

3.1-22

3.1-22

3.4-8

3.4-8

3.4-12

3.4-12

3.5-6

3.5-6

3.5-11

3.5-11

3.6-15

3.6-15

3.6-16

3.6-16

3.6-17

3.6-17

3.6-34

3.6-34

3.6-36

3.6-36

3.6-46

3.6-46

5.0-10

5.0-10

5.0-11

5.0-11

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 207, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed license. DTE Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

DTE Electric Company shall abide by the agreements and interpretations between it and the Department of Justice relating to Article I, Paragraph 3 of the Electric Power Pool Agreement between DTE Electric Company and Consumers Power Company as specified in a letter from The Detroit Edison Company to the Director of Regulation, dated August 13, 1971, and the letter from Richard W. McLaren, Assistant Attorney General, Antitrust Division, U.S. Department of Justice, to Bertram H. Schur, Associate General Counsel, Atomic Energy Commission, dated August 16, 1971.

(4) Deleted

(5) Deleted

(6) Deleted

(7) Deleted

(8) Deleted

(9) Modifications for Fire Protection (Section 9.5.1, SSER #5 and SSER #6)*

DTE Electric Company shall implement and maintain in effect all provisions of the approved fire protection program as described in its Final Safety Analysis Report for the facility through Amendment 60 and as approved in the SER through Supplement No. 5, subject to the following provision:

- (a) DTE Electric Company may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report (SER) and/or its supplements wherein the license condition is discussed.

1.1 Definitions (continued)

CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites."
EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME	The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
INSERVICE TESTING PROGRAM	The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f).
ISOLATION SYSTEM RESPONSE TIME	The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves travel to their required positions. Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.7.6	Verify each SLC subsystem manual valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position, or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.1.7.7	Verify each pump develops a flow rate ≥ 41.2 gpm at a discharge pressure ≥ 1215 psig.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.1.7.8	Verify flow through one SLC subsystem from pump into reactor pressure vessel.	In accordance with the Surveillance Frequency Control Program
SR 3.1.7.9	Verify all piping between storage tank and explosive valve is unblocked.	In accordance with the Surveillance Frequency Control Program <u>AND</u> Once within 24 hours after solution temperature is restored $\geq 48^{\circ}\text{F}$
SR 3.1.7.10	Verify sodium pentaborate enrichment is ≥ 65 atom percent B-10.	Prior to addition to SLC tank

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY								
SR 3.4.3.1	<p>Verify the safety function lift setpoints of the required SRVs are as follows:</p> <table border="1"> <thead> <tr> <th><u>Number of SRVs</u></th> <th><u>Setpoint (psig)</u></th> </tr> </thead> <tbody> <tr> <td>5</td> <td>1135 ± 34.05</td> </tr> <tr> <td>5</td> <td>1145 ± 34.35</td> </tr> <tr> <td>5</td> <td>1155 ± 34.65</td> </tr> </tbody> </table> <p>Following testing, lift settings shall be within ± 1%.</p>	<u>Number of SRVs</u>	<u>Setpoint (psig)</u>	5	1135 ± 34.05	5	1145 ± 34.35	5	1155 ± 34.65	<p>In accordance with the INSERVICE TESTING PROGRAM</p>
<u>Number of SRVs</u>	<u>Setpoint (psig)</u>									
5	1135 ± 34.05									
5	1145 ± 34.35									
5	1155 ± 34.65									
SR 3.4.3.2	<p>Verify each required SRV is capable of being opened.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>								

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MDDE 4.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.5.1 -----NOTE----- Not required to be performed in MODE 3. -----</p> <p>Verify equivalent leakage of each RCS PIV, at an RCS pressure ≥ 1035 and ≤ 1055 psig:</p> <ul style="list-style-type: none"> a. For PIVs other than LPCI loop A and B injection isolation valves is ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm; b. For LPCI loop A and B outboard injection isolation valves is ≤ 0.4 gpm through-seat, and ≤ 5 ml/min external leakage; and c. For LPCI loop A and B inboard injection isolation testable check valves is ≤ 10 gpm. 	<p>In accordance with the INSERVICE TESTING PROGRAM</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY																
SR 3.5.1.8	<p>Verify the following ECCS pumps develop the specified flow rate against a system head corresponding to the specified reactor pressure.</p> <table border="1"> <thead> <tr> <th>SYSTEM</th> <th>FLOW RATE</th> <th>NO. OF PUMPS</th> <th>SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF</th> </tr> </thead> <tbody> <tr> <td>Core</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Spray</td> <td>≥ 5725 gpm</td> <td>2</td> <td>≥ 100 psig</td> </tr> <tr> <td>LPCI</td> <td>≥ 10,000 gpm</td> <td>1</td> <td>≥ 20 psig</td> </tr> </tbody> </table>	SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF	Core				Spray	≥ 5725 gpm	2	≥ 100 psig	LPCI	≥ 10,000 gpm	1	≥ 20 psig	In accordance with the INSERVICE TESTING PROGRAM
SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF															
Core																		
Spray	≥ 5725 gpm	2	≥ 100 psig															
LPCI	≥ 10,000 gpm	1	≥ 20 psig															
SR 3.5.1.9	<p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify, with reactor pressure ≤ 1045 and ≥ 945 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.</p>	In accordance with the INSERVICE TESTING PROGRAM																
SR 3.5.1.10	<p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify, with reactor pressure ≤ 215 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.</p>	In accordance with the Surveillance Frequency Control Program																

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY												
SR 3.5.2.5	<p>-----NOTES-----</p> <ol style="list-style-type: none"> LPCI subsystem(s) may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. Not required to be met for system vent flow paths opened under administrative control. <p>-----</p> <p>Verify each required ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	In accordance with the Surveillance Frequency Control Program												
SR 3.5.2.6	<p>Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.</p> <table border="1"> <thead> <tr> <th>SYSTEM</th> <th>FLOW RATE</th> <th>NO. OF PUMPS</th> <th>SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF</th> </tr> </thead> <tbody> <tr> <td>CS</td> <td>≥ 5725 gpm</td> <td>2</td> <td>≥ 100 psig</td> </tr> <tr> <td>LPCI</td> <td>≥ 10,000 gpm</td> <td>1</td> <td>≥ 20 psig</td> </tr> </tbody> </table>	SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF	CS	≥ 5725 gpm	2	≥ 100 psig	LPCI	≥ 10,000 gpm	1	≥ 20 psig	In accordance with the INSERVICE TESTING PROGRAM
SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF											
CS	≥ 5725 gpm	2	≥ 100 psig											
LPCI	≥ 10,000 gpm	1	≥ 20 psig											
SR 3.5.2.7	<p>-----NOTE-----</p> <p>Vessel injection/spray may be excluded.</p> <p>-----</p> <p>Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	In accordance with the Surveillance Frequency Control Program												

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.3</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. Not required to be met for PCIVs that are open under administrative controls. <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located inside primary containment and is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed.</p>	<p>Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days</p>
<p>SR 3.6.1.3.4</p> <p>Verify continuity of the traversing incore probe (TIP) shear isolation valve explosive charge.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.1.3.5</p> <p>Verify the isolation time of each power operated automatic PCIV, except for MSIVs, is within limits.</p>	<p>In accordance with the INSERVICE TESTING PROGRAM</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.3.6	Perform leakage rate testing for each primary containment purge valve with resilient seals.	In accordance with the Surveillance Frequency Control Program <u>AND</u> Once within 92 days after opening the valve
SR 3.6.1.3.7	Verify the isolation time of each MSIV is ≥ 3 seconds and ≤ 5 seconds.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.1.3.8	Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.3.9	Verify a representative sample of reactor instrumentation line EFCVs actuates on a simulated instrument line break to restrict flow.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.3.10	Remove and test the explosive squib from each shear isolation valve of the TIP System.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.3.11	Verify the combined leakage rate for all secondary containment bypass leakage paths that are not provided with a seal system is $\leq 0.10 L_a$ when pressurized to ≥ 56.5 psig.	In accordance with the Primary Containment Leakage Rate Testing Program and INSERVICE TESTING PROGRAM
SR 3.6.1.3.12	Verify combined MSIV leakage rate for all four main steam lines is ≤ 250 scfh and ≤ 100 scfh for any one steam line when tested at ≥ 25 psig.	In accordance with the Primary Containment Leakage Rate Testing Program
SR 3.6.1.3.13	<p>.....NOTE.....</p> <p>Only required to be met in MODES 1, 2, and 3.</p> <p>.....</p> <p>Verify combined leakage rate through hydrostatically tested lines that penetrate the primary containment is within limits.</p>	In accordance with the Primary Containment Leakage Rate Testing Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.2.3.1	Verify each RHR suppression pool cooling subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.2.3.2	Verify each required RHR pump develops a flow rate $\geq 9,250$ gpm through the associated heat exchanger while operating in the suppression pool cooling mode.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.2.3.3	Verify RHR suppression pool cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.2.4.1	Verify each RHR suppression pool spray subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.2.4.2	Verify each RHR pump develops a flow rate ≥ 500 gpm through the heat exchanger and suppression pool spray sparger while operating in the suppression pool spray mode.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.2.4.3	Verify RHR suppression pool spray subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. Not required to be met for SCIVs that are open under administrative controls. <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange not locked, sealed, or otherwise secured that is required to be closed during accident conditions is closed.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.2.2 Verify the isolation time of each power operated automatic SCIV is within limits.</p>	<p>In accordance with the INSERVICE TESTING PROGRAM</p>
<p>SR 3.6.4.2.3 Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas at or beyond the site boundary conforming to the following:
 - 1. For noble gases: ≤ 500 mrem/yr to the total body and ≤ 3000 mrem/yr to the skin; and
 - 2. For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives > 8 days: ≤ 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190; and
- k. Limitations on venting and purging of the Mark I containment through the Standby Gas Treatment System or the Reactor Building Ventilation System to maintain releases as low as reasonably achievable.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

(continued)

5.5 Programs and Manuals (continued)

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the UFSAR Section 5.2.1.2 cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Not Used

(continued)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 207 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-43

DTE ELECTRIC COMPANY

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION

By application dated July 25, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16207A433), as supplemented by letter dated August 15, 2017 (ADAMS Accession No. ML17228A082), DTE Electric Company (DTE or the licensee), requested changes to technical specification (TS) 5.5.6 for Fermi 2. Specifically, the licensee requested to remove TS 5.5.6 by adopting the Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR [Surveillance Requirement] Usage Rule Application to Section 5.5 Testing," dated October 21, 2015 (ADAMS Accession No. ML15294A555).

The licensee also proposed a new defined term, "INSERVICE TESTING PROGRAM," to the TSs. All existing references to the "Inservice Testing Program" in the Fermi 2 TS SRs are replaced with "INSERVICE TESTING PROGRAM" so that the SRs refer to the new definition.

In addition, the licensee proposed to modify Section 5.5.4, "Radioactive Effluent Controls Program," to clarify that SRs 3.0.2 and 3.0.3 are applicable to the surveillance requirements for the program contained in the Offsite Dose Calculation Manual (ODCM).

The supplement dated August 15, 2017, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on November 22, 2016 (81 FR 83871). The supplement clarified the licensee's intent to remove the inservice inspection (ISI) portion of TS 5.5.6, which was not explicitly stated in the original application but was implied by the requested removal of TS 5.5.6.

2.0 REGULATORY EVALUATION

The Inservice testing (IST) program assesses the operational readiness of a structure, system, or component after first electrical generation by nuclear heat. The purpose of the ISI program is

to maintain a nuclear power plant in working order and to return it to service, following plant outages, in a safe and expeditious manner.

The American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) provides requirements for IST of certain components in light-water nuclear power plants. The ASME OM Code identifies the components subject to the testing (i.e., pumps, valves, pressure relief devices, and dynamic restraints), responsibilities, methods, intervals, parameters to be measured and evaluated, criteria for evaluating results, corrective actions, personnel qualification, and recordkeeping.

ASME Boiler and Pressure Vessel Code (BPV), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," provides requirements for examination and inspection of components in a nuclear power plant.

Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(f), "Preservice and inservice testing requirements," requires that inservice testing of certain ASME Code Class 1, 2, and 3 components must meet the requirements of the ASME OM Code and applicable addenda. Fermi 2 TSs also prescribe IST requirements and frequencies for ASME Code Class 1, 2, and 3 components.

The regulation, 10 CFR 50.55a(f)(5)(ii), states, in part, "If a revised inservice test program for a facility conflicts with the technical specifications for the facility, the licensee must apply to the Commission for amendment of the technical specifications to conform the technical specifications to the revised program."

The regulation, 10 CFR 50.55a(g), "Preservice and inservice inspection requirements," requires that inservice inspection of certain ASME Code Class 1, 2, and 3 components must meet the requirements of the ASME BPV Code, and applicable addenda. Fermi 2 TSs also prescribe inservice inspection requirements and frequencies for ASME Code Class 1, 2, and 3 components.

The regulation, 10 CFR 50.55a(g)(5)(ii), states, in part, "If a revised inservice inspection program for a facility conflicts with the technical specifications for the facility, the licensee must apply to the Commission for amendment of the technical specifications to conform the technical specifications to the revised program."

Radiological Effluent Controls Program

The TS 5.5.4 establishes the Fermi 2 Radioactive Effluent Controls Program (RECP). The program pertains to both gaseous and liquid radioactive effluents that result from the operation of the nuclear plant. The RECP in the TSs is consistent with 10 CFR 50.36a requirements to keep average annual releases of radioactive material in effluents and their resultant committed effective dose equivalents at small percentages of the dose limits specified in 10 CFR 20.1301 and in the license. 10 CFR 50.36a also states that Appendix I of 10 CFR 50, provides numerical guidance on limiting conditions for operation to meet the requirement that radioactive materials in effluents released to unrestricted areas be kept as low as is reasonably achievable (ALARA).

The RECP is implemented by the licensee's ODCM and includes remedial actions to be taken whenever the RECP program limits are exceeded. In order to ensure the annual dose limits of 10 CFR 20 are met, as well as the ALARA criteria of Appendix I of 10 CFR 50, the TS

establishes a requirement that every 31 days, the licensee determine the projected dose in the current calendar quarter and current calendar year. In this manner, if the current quarter projected dose assessments indicate that the ALARA dose criteria of 10 CFR 50, Appendix I may be exceeded, the licensee has time to adjust effluent controls to further reduce the dose.

The RECP further establishes limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed two percent of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50 Appendix I.

TSTF-545

TSTF-545, Revision 3 (TSTF-545), provides guidance to licensees on how to request license amendments that would eliminate conflicting requirements between 10 CFR 50.55a(f), "Preservice and inservice testing requirements" standards and the TSs by eliminating the IST program from Fermi 2 TSs. To address the possible uncertainty regarding the correct application of the SRs, caused by eliminating the testing or test intervals in TS 5.5.6, TSTF-545 also proposes to add a new definition, "INSERVICE TESTING PROGRAM," to the TSs. The new definition would state "the licensee program that fulfills the requirements of 10 CFR 50.55a(f)." TSTF-545 proposes to replace existing uses of the term, "Inservice Testing Program," with the defined term, as denoted by capitalized letters, throughout the TSs.

The NRC approved TSTF-545, (ADAMS Package Accession No. ML15317A071), and published a notice of availability in the *Federal Register* (FR) on March 28, 2016 (81 FR 17208).

2.1 Proposed Technical Specifications Changes

The licensee proposed to delete TS 5.5.6 and replace it with the word "Not Used." TS 5.5.6 currently states:

5.5.6 Inservice Testing and Inspection Program

These programs provide controls for inservice testing and inspection of ASME Code Class 1, 2, and 3 components. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure
Vessel Code and
applicable Addenda
terminology for
inservice testing and
inspection activities

Required Frequencies for performing
inservice testing and inspection
activities

Weekly
Monthly
Quarterly or every 3 months

At least once per 7 days
At least once per 31 days
At least once per 92 days

Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing and inspection activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing and inspection activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

TS 5.5.6b references SR 3.0.2, which allows an extension of IST intervals by up to 25 percent, if it is discovered that a surveillance associated with an IST activity was not performed within the required interval.

TS 5.5.6c references SR 3.0.3 which allows the licensee to delay IST, for up to 24 hours or up to the limit of the specified surveillance frequency, before declaring the associated limiting condition for operation not met, in order to perform the missed surveillance. It also requires a risk evaluation to be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

The licensee further proposed that the Definitions section of TSs be revised by adding the term, "INSERVICE TESTING PROGRAM," with the following definition: "The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f)." The licensee also requested that all existing occurrences of "Inservice Testing Program" in TS SRs be replaced with "INSERVICE TESTING PROGRAM," so that the SRs refer to the new definition in lieu of the program in TS 5.5.6.

The licensee also proposed that Section 5.5.4, "Radioactive Effluent Controls Program," be revised to clarify that SRs 3.0.2 and 3.0.3 are applicable to the surveillance requirements for that program contained in the ODCM.

2.2 Regulatory Requirements and Guidance

The NRC staff considered the following regulatory requirements, guidance, and licensing information during its review of the proposed changes:

- Paragraph 50.36(c) of 10 CFR requires TSs to include: (1) safety limits, limiting safety systems settings, and control settings; (2) limiting conditions for operation; (3) SRs; (4) design features; (5) administrative controls; (6) decommissioning; (7) initial notification; and (8) written reports. 10 CFR 50.36(c)(3) states that "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." Section 50.36(c)(5) of 10 CFR states in part, that "Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

- NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Chapter 16, "Technical Specifications," Revision 3, dated March 2010 (ADAMS Accession No. ML100351425) contains guidance for reviewing TSs. As described therein, as part of the regulatory standardization effort, the NRC staff has prepared improved STSs for each of the LWR nuclear steam supply systems and associated balance-of-plant equipment systems. NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR [Boiling Water Reactor]/4," (BWR/4 STSs), is applicable to Fermi 2 (ADAMS Accession No. ML12104A192).

Inservice Testing and Inspection

- Pursuant to 10 CFR 50.54, "Conditions of licenses," the applicable requirements of 10 CFR 50.55a are conditions of every nuclear power reactor operating license issued under 10 CFR Part 50. These requirements include IST and ISI of nuclear components at nuclear power reactors in accordance with the ASME OM Code as specified in 10 CFR 50.55a(f) and the ASME BPV Code, Section XI, as specified in 10 CFR 50.55a(g), respectively.

The regulations in 10 CFR 50.55a(f) address IST and state, in part:

Systems and components of boiling and pressurized water-cooled nuclear power reactors must meet the requirements of the ASME BPV Code and ASME OM Code as specified in this paragraph. Each operating license for a boiling or pressurized water-cooled nuclear facility is subject to the following conditions [referring to 10 CFR 50.55a(f)(1) through (f)(6)].

The regulations in 10 CFR 50.55a(g) address ISI and state, in part:

Systems and components of boiling and pressurized water-cooled nuclear power reactors must meet the requirements of the ASME BPV Code as specified in this paragraph. Each operating license for a boiling or pressurized water-cooled nuclear facility is subject to the following conditions [referring to 10 CFR 50.55a(g)(1) through (g)(6)].

- ASME OM and ASME BPV Code are a consensus standard and are incorporated by reference into 10 CFR 50.55a.
- NUREG-1482, Revision 2, "Guidelines for Inservice Testing at Nuclear Power Plants: Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants" - Final Report, October 2013 (ADAMS Accession No. ML13295A020) provides guidance for the IST program for pumps and valves.
- NUREG-0800, Section 3.9.6, "Functional Design, Qualification, and Inservice Testing Programs for Pumps, Valves, and Dynamic Restraints," Revision 3, March 2007 (ADAMS Accession No. ML070720041), provides guidance and acceptance criteria for the NRC staff review of the IST program for pumps and valves.

Radioactive Effluent Controls Program

- The regulations in 10 CFR 20.1301 and 20.1302 establish dose limits for individual members of the public and requirements for performing surveys of radiation levels to demonstrate compliance with dose limits for individual members of the public.
- The regulation in 10 CFR 50.36a requires inclusion of TSs that require compliance with applicable provisions of 10 CFR 20.1301, to keep releases of radioactive material in unrestricted areas during normal conditions and expected occurrences, as low as reasonably achievable. 10 CFR 50.36a further states that Appendix I to 10 CFR Part 50, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," provides numerical guidance on limiting conditions for operation to meet the requirement that radioactive materials in effluents released to unrestricted areas be kept as low as is reasonably achievable.
- Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste," provides guidance on calculating dose to individual members of the public.

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's application to determine if removal of TS 5.5.6 and change to TS 5.5.4 are consistent with the guidance, regulations, and licensing information discussed in Section 2.2 "Regulatory Requirements and Guidance" of this safety evaluation. In determining whether an amendment to a license will be issued, the Commission is guided by the considerations that govern the issuance of initial licenses to the extent applicable and appropriate. Among the considerations are whether the TSs, as amended, would provide the necessary administrative controls per 10 CFR 50.36(c)(5) (i.e., provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner). In making its determination as to whether to amend the license, the NRC staff considered those regulatory requirements that are automatically conditions of the license through 10 CFR 50.54. Where the regulations already provide conditions for the license, there is no need for a duplicative requirement in the TSs; the regulations provide the necessary reasonable assurance of adequate protection of public health and safety.

3.1 Deletion of TS 5.5.6 "Inservice Testing and Inspection Program" from the TSs

Fermi 2 TS 5.5.6 has an IST and ISI program that provides controls and frequencies for testing and inspection of ASME Code Class 1, 2, and 3 components. Through 10 CFR 50.54, the applicable requirements of 10 CFR 50.55a are conditions of every nuclear power reactor operating license issued under 10 CFR Part 50. These requirements include 10 CFR 50.55a(f), which specifies the requirements for IST and 10 CFR 50.55a(g), which specifies requirements for ISI. 10 CFR 50.55a(f) requires licensees to meet the IST program requirements of the ASME OM Code. 10 CFR 50.55a(g) requires licensees to meet the ISI program requirements of the ASME BPV Code, Section XI. The ASME OM Code specifies the frequency of testing required to meet the IST requirements of 10 CFR 50.55a(f). The ASME BPV Code, Section XI, specifies the frequency of inspections required to meet the ISI requirements of

10 CFR 50.55a(g). Therefore, maintaining the ISI and IST program frequencies in TS 5.5.6 is duplicative of the license condition in 10 CFR 50.54 and may create conflicts between the TSs and the requirements of 10 CFR 50.55a and the ASME OM and BPV Codes.

Thus, with the proposed TS changes, the licensee will still be required to maintain an IST program in accordance with the ASME OM Code, as specified in 10 CFR 50.55a(f) and an ISI program in accordance with the ASME BPV Code, Section XI, as specified in 50.55a(g). For the reasons explained below, the NRC staff concludes that is not necessary to have duplicative administrative controls in the TSs relating to the IST and ISI program to assure operation of the facility in a safe manner.

TS 5.5.6a

TS 5.5.6a requires IST and ISI functions to be performed periodically (e.g., monthly). TS 5.5.6a sets IST and ISI frequencies precisely (e.g., "at least once per 31 days"), whereas the ASME OM Code and the ASME BPV Code, Section XI, is less precise. The NRC staff finds deletion of TS 5.5.6a is acceptable, even though the ASME OM Code and ASME BPV Code, Section XI are less precise, the periods required by 10 CFR 50.55a(f) and 10 CFR 50.55a(g) are adequate to assure operation of the facility in a safe manner because the testing and inspection frequencies are either the same or comparable.

TS 5.5.6b

TS 5.5.6b allows the licensee to use SR 3.0.2 to extend by up to 25 percent the interval between IST activities, as required by TS 5.5.6a for frequencies specified as two years or less in the inservice testing program. Similar to TS 5.5.6.b, the NRC authorization of ASME Code Case OMN-20, 'Inservice Test Frequency,' by letter dated July 16, 2014, (ADAMS Accession No. ML14176A929), also permits the licensee to extend the IST intervals specified in the ASME OM Code by up to 25 percent. If TS 5.5.6 is deleted, SR 3.0.2 does not apply to the ISI program because the TS do not contain any other SRs associated with the ISI program.

The NRC staff determined that deletion of TS 5.5.6b ensures testing and inspection activities will be performed in accordance with 10 CFR 50.55a(f) and 10 CFR 50.55a(g). The NRC staff finds that the requirements in the TS are duplicative of the 10 CFR 50.55a(f) and 10 CFR 50.55a(g), therefore deletion of TS 5.5.6b is acceptable.

TS 5.5.6c

TS 5.5.6c allows the licensee to use SR 3.0.3 when it discovers that an SR associated with an IST was not performed within its specified frequency. SR 3.0.3 allows the licensee to delay declaring a "limiting condition for operation not met," for IST up to the limit of the specified frequency, in order to perform the missed surveillance. The use of SR 3.0.3 for IST is limited to those inservice tests required by an SR. In accordance with 10 CFR 50.55a, the licensee may use the requirements in ASME OM Code to address issues associated with a missed inservice test. If TS 5.5.6 is deleted, SR 3.0.3 does not apply to the ISI program because the TS do not contain any other SRs associated with the ISI program.

SR 3.0.3 will continue to apply to those IST required by TS SRs. Based on the above, the NRC staff determined that deletion of TS 5.5.6c is acceptable.

TS 5.5.6d

TS 5.5.6d states that nothing in the ASME BPV Code shall be construed to supersede the requirements of any TS. However, 10 CFR 50.55a(f)(5)(ii) requires licensees to apply for an amendment to the TSs if a revised IST program conflicts with technical specifications for the facility. Similarly, 10 CFR 50.55a(g)(5)(ii) requires licensees to apply for an amendment to the TSs if a revised ISI program conflicts with TS for the facility. Consequently, since the regulations address how to resolve conflicts between the requirements in the TS and the requirements in the IST and the ISI programs, the provision is not necessary in the TSs. Therefore, the NRC staff finds that the deletion of TS 5.5.6d is acceptable.

In addition, the NRC staff finds the proposed deletion of TS 5.5.6d acceptable because the surveillance requirements and administrative controls in TS 5.5.6 are not needed to satisfy the requirements for TS surveillance in of 10 CFR 50.36(c)(3) and TS administrative controls in 50.36(c)(5).

3.2 Revision of the Radioactive Effluent Controls Program

TS 5.5.4 requires the RECP to be in conformance with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents ALARA. The current TS establishes a surveillance frequency of 31 days to perform the calculation of current calendar quarter and current calendar year projected dose.

The licensee proposes to make SR 3.0.2 applicable to the TS 5.5.4. SR 3.0.2 allows a surveillance to be performed satisfactorily within 1.25 times the interval specified in the 31 day frequency. A 25 percent extension of this 31-day surveillance frequency would extend the frequency 7.75 days, and result in a total maximum frequency of 38.75 days.

If the quarterly dose and cumulative dose projection indicate the TS quarterly dose criteria is likely to be exceeded, the licensee would have time within the quarter to implement further effluent controls in order to meet the quarterly or annual limits. The modest increase in the surveillance frequency by a factor of 25 percent is not likely to result in the licensee having an exceedance of a quarterly or annual dose limit as specified in the TS.

Similarly, the proposed revision making SR 3.0.3 applicable to TS 5.5.4 would allow the licensee to delay declaring a limiting condition for operation not met, in order to perform the missed surveillance.

The proposed changes to the RECP have previously been approved for other facilities who have adopted TSTF-258-A, Revision 4 and are consistent with the BWR/4 STSs. The changes allow modest increases in surveillance frequencies and flexibility in scheduling surveillances, but continue to require the licensee to take actions to ensure that regulatory requirements are met. This would include meeting the annual dose limits in 10 CFR 20.1301, performing surveys of radiation levels in unrestricted and controlled areas and radioactive materials in effluents, in accordance with 10 CFR 20.1302, and meeting the effluent control requirements in 10 CFR 50.36a. Therefore, the NRC staff finds the proposed revisions making SR 3.0.2 and SR 3.0.3 applicable to RECP TS 5.5.4 are acceptable.

3.3 INSERVICE TESTING PROGRAM Definition and Revision to SRs

The licensee proposes to revise the TS "Definitions" section to include the term, "INSERVICE TESTING PROGRAM," with the following definition: "The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f)." The proposed definition of the INSERVICE TESTING PROGRAM is consistent with the definition in TSTF-545. The NRC staff finds the change in the definition acceptable because it correctly refers to the IST requirements in 10 CFR 50.55a(f).

The licensee requested that all existing references to the "Inservice Testing Program" in SRs be revised to "INSERVICE TESTING PROGRAM" to reference the new TS defined term in lieu of the deleted program. The proposed change is consistent with the intent of TSTF-545, to replace the current references in SRs with the new definition. The NRC staff verified that for each SR reference to the "Inservice Testing Program," the licensee proposed to change the reference to "INSERVICE TESTING PROGRAM." The proposed changes do not alter how the SR testing is performed, however, there may be minor changes in the IST frequencies. The periods required by 10 CFR 50.55a(f) are adequate to ensure safe operations of the facility. As discussed in Section 3.1 of this safety evaluation, the NRC staff determined that the periods are comparable and TSs do not need to include the more precise testing frequencies currently in TS 5.5.6a. The NRC staff finds the proposed revisions referencing the newly defined "INSERVICE TESTING PROGRAM" acceptable.

3.4 Deviations from TSTF-545

In its application, the licensee identified the following deviations from TSTF-545:

- TSTF-545 provides guidance on how to remove an IST program from the Fermi 2 TS 5.5.6. However, unlike the STS on which TSTF-545 is based, Fermi 2 TS 5.5.6 title and provisions also contain ISI requirements. The staff finds that the deletion of ISI from the TSs is consistent with BWR/4 STSs and ensures that ISI activities are performed in accordance with 10 CFR 50.55a(g).
- The licensee proposes to remove the entire content of TS 5.5.6 but retain the TS number by adding the word "Not Used." The staff finds that the minor difference in TS numbering will not effect the clarity of the TSs.
- Some of the proposed numbering and wording for the revised TS SRs do not match TSTF-545 guidance. However, the SRs are equivalent. The staff finds this deviations is not substantive and the SRs will continue to be performed in accordance with the requirements of 10 CFR 50.55a(f).
- The LAR submitted by the licensee also modifies TS 5.5.4, "Radioactive Effluent Controls Program," to clarify that SR 3.0.2 and 3.0.3 are applicable to that program. NRC staff finds that the use of SR 3.0.2 and 3.0.3 will not impact the licensee's ability to meet the TS requirements for limiting the quarterly and annual dose to individual members of the public because the licensee will still have time to adjust effluent controls as needed to satisfy applicable dose controls.

Therefore, the staff finds the proposed deviations from TSTF-545 are acceptable.

3.5 Staff Conclusion

Based on the NRC staff's evaluation of the proposed changes to TSs related to removal of TS 5.5.6, "Inservice Testing and Inspection Program," the NRC staff concludes that the current Fermi 2 TS 5.5.6 requirements are duplicative of the license conditions in 10 CFR 50.54. The periods required by 10 CFR 50.55a for ISI and IST programs and the extensions permitted by the ASME Code, are adequate to assure operation of the facility in a safe manner. Therefore, the NRC staff concludes that deletion of TS 5.5.6 from the TSs is acceptable.

Based on its evaluation of the proposed changes to the surveillance frequency for the RECP, the NRC staff finds that the use of SR 3.0.2 and 3.0.3 will not impact the licensee's ability to meet the TS requirements for limiting the quarterly and annual dose to individual members of the public because the licensee will still have time to adjust effluent controls as needed to satisfy applicable dose controls. Thus, there is reasonable assurance that the change in the RECP surveillance frequency will continue to ensure that the licensee meets regulatory requirements for limiting public dose. This would include meeting the annual dose limits in 10 CFR 20.1301, performing surveys of radiation levels in unrestricted and controlled areas and radioactive materials in effluents in accordance with 10 CFR 20.1302, and meeting the effluent control requirements in 10 CFR 50.36a. Therefore, the NRC staff finds the proposed change acceptable.

Based on the evaluation above, the NRC staff finds removal of IST program, adding a new definition for the INSERVICE TESTING PROGRAM and replacing all references to the "Inservice Testing Program" in SRs with the newly defined term consistent with TSTF-545. NRC staff also finds removal of the ISI program and the revision of the RECP technically acceptable for the reasons discussed above in this safety evaluation.

Therefore, the NRC staff finds that the licensee's proposed TS changes are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment on April 25, 2017. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding published in the FR on November 22, 2016 (81 FR 83874). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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SUBJECT: FERMI 2 - ISSUANCE OF AMENDMENT TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-545, REVISION 3, "TS INSERVICE TESTING PROGRAM REMOVAL & CLARIFY SR USAGE RULE APPLICATION TO SECTION 5.5 TESTING" (CAC NO. MF8262, EPID L-2016-LLA-0006) DATED NOVEMBER 29, 2017

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