



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

March 26, 2018

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: FERM1 2 – REGULATORY AUDIT FOR LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION 3.7.2 FOR EMERGENCY EQUIPMENT COOLING WATER/EMERGENCY EQUIPMENT SERVICE WATER SYSTEM AND ULTIMATE HEAT SINK (CAC NO. MG0017; EPID L-2017-LLA-0270)

Dear Mr. Polson:

By letter dated July 17, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17198C829), DTE Electric Company (DTE), submitted a license amendment request (LAR) for Fermi 2. The LAR would revise technical specification (TS) 3.7.2 for emergency equipment cooling water/emergency equipment service water system and ultimate heat sink (UHS) Conditions and Surveillance Requirements to reflect a proposed change to the UHS design of the two redundant cross-tie lines.

The U.S. Nuclear Regulatory Commission (NRC) staff will perform a regulatory audit to support its review of the LAR in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to gain understanding, verify information, and/or identify information that will require docketing to support the basis for the licensing decision regarding the LAR.

The audit will be performed using an online reference portal that will allow the NRC staff limited read-only access to licensee documents. Use of the online reference portal is acceptable as long as the following conditions are met:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis.
- The online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents.
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that DTE agrees to the

terms and conditions set forth in this letter and also provide NRC staff the information needed to access the portal, such as username and password, as soon as possible.

The enclosed audit plan identifies the documents which should be uploaded to the portal. The NRC staff will request additional information if needed to support the staff's regulatory decision using its normal process. If you have any questions, please contact me at (301) 415-8004 or Sujata.Goetz@nrc.gov.

Sincerely,



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

Docket No. 50-341

Enclosure:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
RELATED LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATION 3.7.2
FERMI 2
DTE ELECTRIC COMPANY
DOCKET NO. 50-341

BACKGROUND

By letter dated July 17, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17198C829), DTE Electric Company (DTE), submitted a license amendment request (LAR) for Fermi 2. The LAR would revise technical specification (TS) 3.7.2 for emergency equipment cooling water/emergency equipment service water system and ultimate heat sink (UHS) Conditions and Surveillance Requirements to reflect a proposed change to the UHS design of the two redundant cross-tie lines.

In Section 2.0 of the LAR, DTE states that the Fermi 2 UHS is provided by the residual heat removal (RHR) complex. The UHS is sized to provide sufficient cooling for 7 days following a reactor shutdown without makeup water addition. The UHS consists of two one-half-capacity reinforced-concrete structures. The two reservoirs are separated by a 4-foot thick concrete wall. The two reservoirs are connected by two valved lines (through the 4-foot thick concrete wall) to permit access to the combined inventory of the two reservoirs to either RHR division in the event of a mechanical failure in one of the RHR divisions. Each line contains two isolation valves. These two lines and their valves are referred to as the UHS cross-tie lines and cross-tie valves.

DTE is proposing to permanently remove the cross-tie valves from both of the cross-tie lines. This design change would result in the reservoirs being permanently cross-connected. This design change requires modification of TS 3.7.2, since the conditions related to the reservoirs are being separated and the surveillance requirements referring to the valves would no longer be applicable.

REGULATORY BASES

The audit will support the review of the LAR. The purpose of the audit is to verify assumptions and input used to request removal of the valves from both of the cross-tie lines.

INFORMATION REQUESTED

The NRC staff is requesting the UHS design basis calculations used to support the removal of the cross-tie valves. Additional documents may be requested later as part of the audit.

TEAM

The U.S. Nuclear Regulatory Commission (NRC) staff participation is expected to include the following individuals but these assignments may change.

- Sujata Goetz, Project Manager
- Gerald Puciarello, Technical Reviewer

Additional NRC staff may be involved in the review of documents on the portal as the staff's review progresses.

LOGISTICS

The audit will be conducted primarily using an online electronic information portal. If necessary, the NRC staff will make arrangements to review hard-copies at a location to be determined. Meetings and teleconferences will be held as necessary for clarification of information. As necessary, public meetings will be used for technical discussions. The audit will begin once the initial list of documents is made available to the NRC technical reviewer on the online electronic information portal. The audit will end before the staff makes a final regulatory decision on the LAR.

SPECIAL REQUESTS

DTE should establish an online reference portal that allows the NRC staff to access documents remotely. The following conditions associated with the online reference portal must be maintained throughout the duration of the review process:

- The online reference portal will be password-protected;
- Passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user. The initial list of documents above should be made available as soon as possible to ensure timely completion of the audit. Username and password information should be provided directly to the NRC staff member. All other communications should be coordinated with the NRC project manager who will inform DTE if any additional staff members need access to the portal.

DELIVERABLES

The NRC staff will inform DTE when the audit has concluded, and will hold an exit meeting if needed. The staff will complete an audit summary to document its observations and conclusions within 30 days of the completion of the audit. The audit summary will be made public once the review of the audit has been completed. Should the staff identify information

during the audit that is needed to support its regulatory decision on the LAR, the staff will issue a request for additional information using the standard NRC process.

SUBJECT: FERMI 2 – REGULATORY AUDIT PLAN FOR LICENSE AMENDMENT
 REQUEST TO REVISE TECHNICAL SPECIFICATION 3.7.2 FOR EMERGENCY
 EQUIPMENT COOLING WATER / EMERGENCY EQUIPMENT SERVICE
 WATER SYSTEM AND ULTIMATE HEAT SINK (CAC NO. MG0017;
 EPID L-2017-LLA-0270) DATED MARCH 26, 2018

DISTRIBUTION:

PUBLIC

RidsACRS_MailCTR Resource

RidsNrrDorl Resource

RidsNrrDorlLpl3 Resource

RidsNrrLASRohrer Resource

RidsNrrPMSGoetz Resource

RidsRgn3MailCenter Resource

ADAMS Accession No. ML18074A084

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DSS/SBPB/BC
NAME	SGoetz	SRohrer	RDennig
DATE	3/22/18	3/20/18	3/22/18
OFFICE	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM	
NAME	DWrona	SGoetz	
DATE	3/26/18	3/26/18	

OFFICIAL RECORD COPY