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DTE

April 16, 2019
NRC-19-0029

10 CFR 50.55a

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Fermi 2 Power Plant
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Withdrawal of the Inservice Inspection / Nondestructive Examination Program Relief Request RR-A36 for the Fourth Ten-year Interval

References: 1) DTE Letter NRC-19-0016, "Submittal of the Inservice Inspection / Nondestructive Examination Program Relief Requests for the Fourth Ten-year Interval," dated February 28, 2019 (ML19059A327).

In Reference 1, DTE Electric Company (DTE) submitted relief request RR-A36 for the fourth ten-year interval of the Inservice Inspection (ISI) / Nondestructive Examination (NDE) program at Fermi 2. Relief request RR-A36, "Alternative Pressure Testing Requirements for the Reactor Pressure Vessel Flange Leak-Off Piping," was submitted pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (z)(2) and was based on precedent of the third ten-year interval of the ISI/NDE program. Relief Request RR-A36 was accepted for review by the NRC as documented by email from Sujata Goetz (NRC) to Jason Haas (DTE) dated March 25, 2019 (ML19085A551).

Subsequent to the submittal in Reference 1, DTE identified that Regulatory Guide (RG) 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 18, includes Code Case N-805 in Table 1 as a code case which is acceptable to the NRC for application in a licensee's Section XI ISI programs. Code Case N-805 is entitled "Alternative to Class 1 Extended Boundary End of Interval or Class 2 System Leakage Testing of the Reactor Vessel Head Flange O-Ring Leak-Detection System, Section XI, Division 1." DTE review of Code Case N-805 determined that it addresses the same issue as identified in RR-A36 and utilizes the same proposed solution. Based on its inclusion in RG 1.147 Table 1, DTE plans to utilize Code Case N-805 for the fourth ten-year interval of the ISI/NDE program. As a result, NRC review and approval of relief request RR-A36 is no longer required. DTE hereby withdraws relief request RR-A36 of Reference 1.

Note that Reference 1 included several other relief requests which are unaffected by this letter. Those other relief requests were accepted for review by the NRC as documented by email from Sujata Goetz (NRC) to Jason Haas (DTE) dated March 25, 2019 (ML19085A551). NRC review and approval of those other relief requests is still required by the date indicated in Reference 1 to support planned testing for the fourth ten-year ISI/NDE interval during the next refueling outage scheduled in the spring of 2020.

No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact Mr. Scott A. Maglio, Manager – Nuclear Licensing, at (734) 586-5076.

Sincerely,

Paul Fessler
Senior Vice President and CNO

cc: NRC Project Manager
NRC Resident Office
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