

NRR-DRMAPEm Resource

From: Goetz, Sujata
Sent: Monday, May 20, 2019 10:25 AM
To: Jason R Haas
Subject: Request for Additional Information LAR TS 3.3.5.3
Attachments: TS3353.docx

Dear Mr. Haas,

By letter dated February 27, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19059A251), DTE Energy Company (the licensee) submitted a license amendment request to replace existing technical specifications requirements related to “operations with a potential for draining the reactor vessel” with new requirements on reactor pressure vessel water inventory control to protect Safety Limit 2.1.1.3.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is necessary to complete its review of the licensee proposed alternative. The NRC staff’s request for additional information (RAI) is provided below.

The staff requires additional information to complete its review of the licensee’s request, as detailed in the attached document. Your response is due to the NRC by June 20, 2019.

Sujata Goetz
Project Manager, Fermi, Unit 2

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Hearing Identifier: NRR_DRMA
Email Number: 2

Mail Envelope Properties (BL0PR0901MB2370E8EB71CE40A3F250876180060)

Subject: Request for Additional Information LAR TS 3.3.5.3
Sent Date: 5/20/2019 10:25:19 AM
Received Date: 5/20/2019 10:25:00 AM
From: Goetz, Sujata

Created By: Sujata.Goetz@nrc.gov

Recipients:
"Jason R Haas" <haasj@dteenergy.com>
Tracking Status: None

Post Office: BL0PR0901MB2370.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1184	5/20/2019 10:25:00 AM
TS3353.docx	23193	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION 3.3.5.3, REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL INSTRUMENTATION

DTE ENERGY COMPANY

FERMI 2 POWER PLANT

DOCKET NO. 50-341

EPID: L-2019-LLR-0041

RAI-1

10 CFR 50.36(c)(2) states Limiting Conditions for Operation (LCOs) are the lowest functional capability or performance level of equipment required for safe operation of the facility and further requires that, when an LCO of a nuclear reactor plant is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met.

10 CFR 50.36(c)(3) states surveillance requirements (SRs) 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 LCOs will be met.

The LAR proposes a NOTE which would modify the SRs in a manner which would not require performance of remedial actions (entering associated ACTIONS Conditions) when the LCO is not met due to SR performance.

Section 3.0 of the LAR contains a justification for a six hour allowance for non-entry into associated Conditions during SRs. This justification appears to be based on NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," Dated December 1988.

By letter dated September 17, 2018, NRC issued Amendment 211 (ADAMS Accession No. ML18247A452), where DRAIN TIME was explicitly defined in Fermi 2 TS. Fermi's TS now have a DRAIN TIME definition and a new TS 3.5.2 describing Conditions when DRAIN TIME is less than 6 hours, specifically Condition D of TS 3.5.2, DRAIN TIME < 8 hours. It is not clear that NEDC-30936-P-A can be used as a justification for non entry into Conditions when DRAIN TIME is less than 6 hours. Please provide:

- a.) An explanation of why DTE's evaluation of proposed note is appropriate when the DRAIN TIME is shorter (i.e., less than 6 hours.) Otherwise, please consider revising the proposed note and;
- b) a description of how the injection permissive function is maintained without placing the inoperable channel in trip as is currently required in Fermi 2 TS 3.3.5.3 Condition C (i.e., describe how the injection permission functions for low pressure coolant injection and core spray are maintained during testing.)