B. Ralph Sylvia
Senior Vice President

Detroit Edison

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November 16, 1989
NRC-89-0228

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) Detroit Edison Letter to NRC, NRC-88-0189, "Proposed Technical Specification Change (License Amendment) - Accident Monitoring Instrumentation (3/4.3.7.5), Drywell and Suppression Chamber Oxygen Concentration (3/4.6.6.2), and Special Test Exceptions - Oxygen Concentration (3/4.10.5)", dated November 15, 1988.

3) NRC Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program", dated January 31, 1989

Subject: Supplement to Proposed Technical Specification Change (License Amendment) - Accident Monitoring Instrumentation (3/4.3.7.5) (TAC No. 72049)

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed changes into the Plant Technical Specifications. The Reference 2 submittal proposed, among other things, to clarify the requirements for the Standby Gas Treatment System Radiation Monitors by specifying three instrument ranges of concern. This submittal adds a fourth instrument range to the listing. Detroit Edison determined that it was appropriate to include the fourth instrument range in Specification 3/4.3.7.5 during the review of radiological effluent controls in conjunction with the implementation of Generic Letter 89-01 (Reference 3).

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Detroit Edison has determined that the no significant hazards considerations analysis contained in Reference 2 remains applicable to the proposal as modified herein.

The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specifications and concurs with the enclosed determinations. In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

If you have any questions, please contact Mr. Glen Ohlemacher at (313) 586-4275.

Sincerely,

B Ralph Sylvia

Enclosure

cc: A. B. Davis
R. W. Defayette
W. G. Rogers
J. F. Stang
Supervisor, Advanced Planning and Review Section,
Michigan Public Service Commission

I, B. RALPH SYLVIA, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

B. Ralph Sylvia
B. RALPH SYLVIA
Senior Vice President

On this 16th day of November 1989, before me personally appeared B. Ralph Sylvia, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosalie A. Armetta
Notary Public

ROSALIE A. ARMETTA
Notary Public, Monroe County, MI
My Commission Expires Jan. 11, 1992

Modified Provisions for Standby Gas Treatment System Radiation Monitors

In Reference 2 Detroit Edison proposed Technical Specification changes to clarify certain requirements of Technical Specification 3/4.3.7.5, Accident Monitoring Instrumentation. Among these requirements are those for the Standby Gas Treatment System (SGTS) Radiation Monitors. Currently, the monitors of concern are poorly defined. Footnotes applied to the table items listing these monitors indicate that the item refers to the "High (accident) range noble gas monitors." In light of the information contained in these footnotes, Detroit Edison proposed to specify the two accident range instrument ranges, the SGTS-AXM - Noble Gas (Mid-range and High-range), in the Reference 2 proposal along with the SGTS - Noble Gas (Mid-range) instrument range. The SGTS - Noble Gas (Mid-range) was included since that instrument range contained the automatic start feature of the AXM instrument ranges.

The SGTS - Noble Gas (Low-range) was not included in the Reference 2 listing of ranges since it is not associated with the description of the monitors contained in the Table footnotes; that is, the SGTS - Noble Gas (Low Range) is not a "High (accident) range noble gas monitor." Rather, it is the normal range effluent monitoring instrument for the SGTS effluent pathway.

In Generic Letter 89-01, (Reference 3) the NRC made provisions to allow licensees to relocate details concerning the controls for the normal effluent monitoring function to the Off-site Dose Calculation Manual (ODCM). At Fermi 2, this would include the Technical Specification controls for the SGTS - Noble Gas (Low Range) instrumentation.

In reviewing the provisions in Generic Letter 89-01 Detroit Edison determined that the SGTS - Noble Gas (Low Range) played a role in the monitoring of releases in off-normal transient events. Included were transients which would cause Emergency Response Plan activation for abnormal radiological releases at the Alert level. For these reasons, Detroit Edison determined that the remedial actions contained in Specification 3/4.3.7.5 for the SGTS accident range Noble Gas instrumentation should also be applied to the SGTS - Noble Gas (Low Range) Instrumentation.

Detroit Edison considered applying these controls administratively through the ODCM. However, for consistency it was determined that the requirement was best included with the requirements for the other three ranges which had already been proposed to be listed in Specification 3/4.3.7.5.

Cross-references between the entries in Specification 3/4.3.7.5 and 3/4.3.7.12 for the SGTS - Noble Gas (Low-Range) Monitor were added to remind the users that the monitor appears in more than one location in the Technical Specifications. This is a human factors enhancement.

For completeness, the attached Technical Specification change pages include all changes proposed in Reference 2.

SIGNIFICANT HAZARDS CONSIDERATION

This submittal modifies the Reference 2 proposal solely to amend the listing of instrument ranges provided to clarify the accident monitoring instrumentation for the SGTS. The basis for the proposed conclusion that the Reference 2 proposal does not involve a significant hazards consideration was published in the Federal Register on May 17, 1989 (54 FR 21305). In regards to the clarification of the required SGTS Radiation Monitors instrumentation the conclusion was based upon the proposed change solely providing a more detailed list of requirements. Since this underlying purpose of the proposal remains that of providing this detailed listing of required instrumentation, the conclusion as published does not change.