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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

- Reference:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) General Electric BWR Owners' Group
Topical Report, NEDC-32013P. "System Analyses for the Elimination of Selected Response Time Testing Requirements." March 1992 (Proprietary)
 - 3) Detroit Edison letter to NRC, NRC-92-0001, "Proposed Technical Specification Change (License Amendment) for Selected Response Time Testing Requirements," dated March 27, 1992

Subject: Comments on Proposed Generic Letter on Relocation of Technical Specification Tables on Instrument Response Time Limits (58 FR 18118, April 7, 1993)

Detroit Edison appreciates the opportunity to comment on the proposed Generic Letter (GL) to allow Response Time Testing surveillance limits to be relocated from the Technical Specifications. In general, we support the concept that, as far as possible, technical details such as these should be under the control of the licensee.

The proposed guidance does not address those instrument channels which are indicated as "NA" (not applicable) in the required response time column. In addition, other clarifying notes appear in these tables which help define the time period which is required to be measured. The GL needs to address how this information should be retained in the Technical Specifications or if it can be relocated.

The proposed GL indicates that the RTT surveillance requirements should be modified to add an exemption from RTT for neutron detectors. The model Technical Specifications of Enclosure 2 of the GL does not include this change. The model Technical Specifications should be modified to include the change.

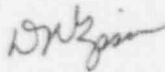
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Additionally, the BWR Owners' Group has submitted a Topical Report (Reference 2) and Detroit Edison has submitted a license amendment request (Reference 3) to modify or eliminate many RTT requirements. The GL needs to take into account that many requests for RTT requirement changes are likely following NRC staff review of the Topical Report. Confusion can be avoided and resources conserved if this GL is coordinated with the Topical Report review.

In summary, the GL needs to address that the TS response time limit tables contain more information than presently covered by the GL. Also, the GL needs to take into account the industry efforts to reduce the burden of RTT.

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

Sincerely,



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