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January 4, 1991 NRC-90-0190

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

- Reference: 1) Fermi 2 NRC Docket No. 50-341 NRC License No. NPF-43
 - 2) Detroit Edison Letter to the NRC, "Proposed Technical Specification Change (License Amendment) -Administrative Controls (Section 6)." NRC-90-0105. dated August 1, 1990

Subject: Nuclear Safe by Review Group Membership

The purpose of this letter in to request a waiver of the education 1. requirements of the current Technical Specifications for appointment of Nuclear Safety Review Group (NSRG) members in order to appoint three new members before the next (January 24, 1991) meeting.

In Reference 2 Detroit Edison proposed a change to section 6.5.2.2 of the Fermi 2 Technical Specifications to remove the requirement that Nuclear Safety Review Group (NSRG) members possess at least a bachelor's degree in engineering or related science. As written, specification 6.5.2.2 unnecessarily restricts otherwise qualified individuals, who do not possess an appropriate bachelor's degree, from being appointed to the NSRG. The proposed specification will require those without a bachelor's degree in engineering or related science to have at least 10 years of responsible power plant experience of which a minimum of 3 years shall be nuclear power plant experience (the 10 year requirement is an increase of 5 years over the current requirement.)

Detroit Edison would like to expedite the addition of three individuals to the NSRG who do not possess the degree requirements specified in section 6.5.2.2, but are otherwise fully qualified. The three individuals are key managers at Fermi 2 and will strengthen the NSRC through their participation. A brief summary of their experience is as follows:

USNRC January 4, 1991 NRC-90-0190 Page 2 D. R. Gipson, Assistant Vice President and Manager Nuclear Production, has 21 years nuclear related experience. He has earned an SRO license and has held the position of Plant Manager. In addition, he possesses an Associate of Science degree. R. L. Andersen, Superintendent Radiation Protection, has 17 years nuclear related experience in the areas of health physics, radiation protection, and radioactive waste. He has a Bachelor of Arts degree in German and has taken graduate courses in Health Physics. R. B. Stafford, General Director Nuclear Assurance, has 24 years of experience in the quality assurance area, 14 of which were related to nuclear. He holds an Associate of Science degree in Mechanical Engineering. These are the types of individuals and experience levels we are envisioning in our Technical Specification change request. Please note that neither Standard Technical Specifications nor the draft BWROG Improved Technical Specifications contain an education requirement for NSRG members. Pending approval of the proposed Technical Specification in Reference 2, Detroit Edison will continue to maintain a minimum of rine NSRG members who do have a bachelor's degree in engineering or related sciences as required Technical Specification 6.5.2.2. Your prompt review and approval of this matter would be appreciated. We would like to have these individuals appointed as NSRG members prior to our January 24, 1991 NSRG meeting. I have discussed this request with Mr. John Zwolinski, NRC Assistant Director for Region III Reactors, on December 27, 1990. If you have any additional questions, please contact me at (313) 586-1901. Sincerely. S. G. Catola

cc: A. B. Davis

R. W. DeFayette

W. G. Rogers

J. F. Stang

J. Zwolinski