



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 8, 2020

Mr. Peter Dietrich
Senior Vice President and Chief Nuclear Officer
DTE Electric Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI 2– AUDIT PLAN IN SUPPORT OF THE REVIEW OF LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO CHANGE SURVEILLANCE INTERVALS TO ACCOMMODATE A 24-MONTH FUEL CYCLE (EPID L-2019-LLA-0249)

Dear Mr. Dietrich:

By letter dated November 8, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19312A110), DTE Energy Company (DTE) submitted the license amendment request (LAR) for Fermi 2, regarding revisions to the technical specifications. Specifically, the amendments propose to increase certain surveillance requirement intervals from 18 months to 24 months.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed DTE's LAR and determined that a regulatory audit would assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information.

The audit will be conducted to increase the NRC staff's understanding of the LAR and identify information that will require docketing to support the NRC staff's regulatory findings. The audit will be conducted from April 13, 2020, through April 24, 2020, using an online portal (also known as electronic portal, ePortal, electronic reading room) established by DTE. The enclosed audit plan was discussed with your staff on March 30, 2020.

If you have any questions, please contact me at 301-415-1421 or at Surinder.Arora@nrc.gov.

Sincerely,

/RA/

Surinder S. Arora, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:
Audit Plan

cc: Listserv



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REGULATORY AUDIT PLAN
TO SUPPORT REVIEW OF THE LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATIONS TO CHANGE
SURVEILLANCE INTERVALS TO ACCOMMODATE A 24-MONTH FUEL CYCLE
FERMI 2
DOCKET NO. 50-341

1.0 BACKGROUND

By letter dated November 8, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19312A110), DTE Energy Company (DTE) (the licensee) submitted a license amendment request (LAR) regarding revisions to the Technical Specifications (TSs) for Fermi 2. Specifically, the amendment request proposes changes to the TSs to increase certain Surveillance Requirement (SR) intervals from 18 months to 24 months to accommodate a 24-month fuel cycle.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined the need for a regulatory audit to be conducted in accordance with the Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits," (ADAMS Accession No. ML19226A274), for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the request, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

2.0 REGULATORY AUDIT BASIS

The NRC staff (i.e., audit team) will perform the audit to support its evaluation of whether the licensee's request meets the requirements of Section 50.36(c)(3), "Surveillance requirements," of Title 10 of the *Code of Federal Regulation* and continue to meet the plant-specific principal design criteria as described in the Fermi 2, Updated Final Safety Analysis Report.

The NRC staff determined an audit to be the most efficient approach toward a timely resolution of questions associated with this LAR review since the staff will have an opportunity to minimize potential requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting online access to an initial set of documentation to be reviewed remotely. Upon completion of this desk audit, the staff is expected to achieve the following:

Enclosure

1. Determine the need for additional documentation.
2. Develop a request for additional information as needed.

Any RAIs will be issued soon after the audit with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in the development of the technical NRC staff's safety evaluation will be requested to be submitted on the docket.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The desk audit is being conducted to get a better understanding of the submittals and the availability of the information to make an assessment of the NRC staff's review approach. The area of focus for the regulatory audit is the information that will be requested by the NRC. The staff will review the documentation and generate any RAIs necessary to complete the review.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests the licensee to have the following information readily available and accessible for the staff's review via an internet-based portal:

- Applicable surveillance test reports and equipment failure reports for the previous five cycles for systems and components subject to the LAR.
- Documentation related to the evaluation of the effect on safety by the surveillance testing interval extension including the methodology used for the evaluation.
- Documentation including evaluation and methodology used to confirm that the assumptions in the plant licensing basis would not be invalidated because of the surveillance test interval extensions.

Note: Non-docketed licensee information will not be removed from the audit site by NRC staff. Based on the review, the NRC staff will determine whether it needs to request any additional documents to be made available on the portal, or additional information needs to be submitted on docket for the staff to complete the review of the LAR.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- Mr. Derek Scully, Reactor Systems Engineer - Team Leader
- Mr. Wendell Morton, Electronics Engineer
- Mr. Khoi Nguyen, Electrical Engineer
- Mr. Syed Haider, Nuclear Engineer
- Ms. Caroline Tilton, Safety and Plant Systems Engineer
- Mr. Surinder Arora, Project Manager

6.0 LOGISTICS

The audit will be conducted from April 13, 2020 through April 24, 2020, using an online portal (also known as electronic portal, ePortal, electronic reading room) established by DTE. The audit team's access to the online portal can be terminated at completion of the audit or as otherwise determined.

If necessary, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team may request that representatives of DTE answer audit team questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference.

The NRC project manager will coordinate any changes to the audit schedule with the licensee.

7.0 SPECIAL REQUESTS

The audit team would like access to the documents listed above in Section 4.0 through an online portal (also known as eDocs, electronic reading room, ePortal) that allows the audit team to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the audit team has access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

User name and password information should be provided directly to the NRC staff. The NRC project manager will provide DTE the names and contact information of the NRC staff who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

An audit summary, which may be public, will be prepared within 60 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the NRC staff will issue RAIs to the licensee.

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ADAMS Accession No.: ML20094G814

*by e-mail

OFFICE	DORL/LPL3/PM	DORL/LPL1/LA	DEX/EICB/BC*	DEX/EEOB/BC*
NAME	SArora	SRohrer (R)	BVenkataraman	BTitus
DATE	03/25/2020	04/07/2020	03/31/2020	03/25/2020
OFFICE	DSS/SNSB/BC*	DSS/SCP/BC*	DORL/LPL3/BC*	DORL/LPL3/PM
NAME	JBorromeo	BWittick	NSalgado	SArora
DATE	03/25/2020	03/25/2020	04/08/2020	04/08/2020

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