



Douglas R. Gipson
Senior Vice President
Nuclear Generation

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5249

December 14, 1995
NRC-95-0134

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, "Submittal and Request for Review of Revision 13 to the Fermi 2 Radiological Emergency Response Preparedness Plan", NRC-95-0040, dated April 10, 1995
 - 3) NRC Letter to Detroit Edison, "Request for Additional Information Regarding Revision 13 to the Fermi 2 Radiological Emergency Response Preparedness Plan (TAC No. M92348)", dated August 16, 1995
 - 4) Detroit Edison letter to NRC, "Detroit Edison Response to the NRC Request for Additional Information Regarding Fermi 2 Radiological Emergency Response Preparedness Plan," NRC-95-0123, dated November 3, 1995

Subject: Detroit Edison Response to NRC Final Comments on the Proposed Revision 17 (earlier 13) to the Radiological Emergency Response Preparedness Plan

This letter confirms the telephone conversation between our Ms. Lynne Goodman, et al and Mr. Timothy G. Colburn, et al of your staff on December 5, 1995 to resolve your final comments regarding our proposed changes to the Fermi 2 RERP Plan emergency classification scheme and emergency action levels (EAL). Given below is Detroit Edison's response and resolution to your comments.

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- 1) We consulted NEI on the intent of the generic guidance relating to drywell pressure indication of a reactor coolant barrier failure. They told us there was no intent to differentiate between drywell pressure alarm and trip setpoints. The clear intent is to select a drywell pressure value that is a site specific indication of a loss of coolant accident. We selected 1.68 psig drywell pressure because it is the reactor scram setpoint and Emergency Core Cooling System initiation setpoint for a loss of coolant accident. It is also an EOP entry condition. The Emergency Procedure Guidelines (EPG) include drywell pressure above the high drywell pressure scram setpoint as an entry condition for the RPV Control Guideline. The EPG Appendix B basis states that the drywell pressure entry condition is indicative of a line break occurring in the drywell. NESP-007 section 3.4 states that "...barrier based EALs are primarily derived from Emergency Operating Procedure Critical Safety Function Status Tree Monitoring (or their equivalent)." The human factors considerations required by NESP-007 also support selection of 1.68 psig drywell pressure as the EAL. As stated earlier, 1.68 psig is the reactor scram setpoint, ECCS initiation setpoint and EOP entry condition. A different value of drywell pressure for the EAL would be an unnecessary challenge to the Emergency Response Organization to recognize.
- 2) Detroit Edison has revised the reactor coolant system barrier EAL #3 wording to clarify the intent of the time after shutdown component. The new wording replaces "immediately after reactor shutdown" with "two minutes after reactor shutdown or beyond". The intent is to provide time for decay of N-16 and also clarify that this EAL does not only apply to immediately after reactor shutdown.
- 3) Detroit Edison has revised the SG1 EAL component corresponding to the guidance for indication of continuing degradation of core cooling based on the Fission Product Barrier monitoring. The new indication is "Reactor water level less than 0 inches". The new EAL is a more accurate representation of degradation of core cooling and is closely tied to fission product barrier monitoring. Reactor water level less than 0 inches is a reactor coolant system barrier loss EAL.
- 4) For SG2, the generic guidance requires a site specific indication that core cooling is extremely challenged or heat removal is extremely challenged. Fermi 2 uses emergency depressurization in accordance with any EOP as that site specific indication. In the failure to scram condition, emergency depressurization based on reactor water level may be warranted, but this EAL approach also accounts for intentional lowering of reactor water level to

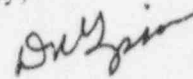
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control power. Therefore this is the best indication of an extreme challenge to core cooling. In a failure to scram condition the most limiting heat removal capability is that of the primary containment. Indications of extreme challenges to primary containment result in emergency depressurization in accordance with EOPs and therefore emergency depressurization is the best EAL.

Attachment 1 is the changed portion of the RERP Plan. Attachment 2 is the corresponding changed portion of the draft procedure EP-101. As indicated in earlier correspondence we will not implement this classification scheme and emergency action levels until approved by the NRC.

If you have any questions related to this material, please contact Mr. Kevin Morris at (313) 586-4327.

Sincerely,



Attachments (2)

cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel