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Nuclear
Operations

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NRC-92-0053

Chief, Regulatory Publications 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) NUREG-1449, Draft Report for Comment
published February 1992

Subject: Detroit Edison's Comments on NUREG-1449
"Shutdown and Low-Power Operation at Commercial
Nuclear Power Plants in the United States"

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USNRC

Detroit Edison agrees that proper management of outage activities can reduce both the likelihood and consequences of events. Detroit Edison shares the same concerns and Senior Management from Fermi 2 have participated in NUMARC's, "Shutdown Plant Issues Working Group". NUMARC formed the Working Group to coordinate industry activities relating to shutdown safety. In December 1991, the Working Group published, "Guidelines for Industry Actions to Assess Shutdown Management". Detroit Edison agrees with the guidance.

Detroit Edison finds that NUREG-1449 is a very comprehensive report which contains a thorough evaluation of shutdown and low-power operations at nuclear power plants. Detroit Edison agrees that public health and safety has been adequately protected while plants were in shutdown conditions. However, safety improvements are possible and warranted. Detroit Edison certainly agrees that the premise "shutdown" does not necessarily mean "safe".

The NRC staff, however, makes statements in the report with which Detroit Edison does not completely agree. An example of this is in the Executive Summary, page XV, "Mark I and II BWR secondary containments offer little protection", ... etc. The Fermi 2 secondary containment offers substantial processing capabilities when ventilation, heat transfer and condensation effects are realistically considered. A second example refers to Section 5.1.2.3 of NUREG-1449, "Fire Protection".

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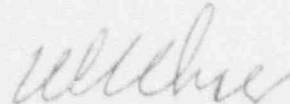
NUREG-1449 does not consider that fire protection equipment is required to be operable at all times that the technical specification equipment that it is protecting is required to be operable. Detroit Edison does agree with most of the principal findings and conclusions reached by NUREG-1449.

Detroit Edison's primary concern is that all changes implemented as a result of NUREG-1449 will not have the proper regulatory review process. As an example, NUREG-1449 recommends changes to the "License Examiners Handbook", which in the past has been revised without a review by licensees. Changes to the "License Examiners Handbook" need to be properly evaluated and validated to assure stress to operating crews is not increased. Detroit Edison believes that an open forum for all changes implemented as a result of the NUREG is the most productive approach.

NUMARC and the BWR Owners Group have commented on NUREG-1449. Detroit Edison agrees with the comments submitted by NUMARC and the BWR Owners Group.

The opportunity to comment on NUREG-1449 is appreciated by Detroit Edison. If you have any questions concerning these comments, please contact Mr. Joseph M. Pendergast, Compliance Engineer at (313) 586-1682.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. H. H. H.", is written in dark ink.

cc: T. G. Colburn
A. B. Davis
M. P. Phillips
S. Stasek
Region III