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December 21, 1995
NRC-95-0133

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) Federal Register, Vol. 60, No. 186, dated September 26, 1995 (FR 60 49495), Final Rule: Primary Containment Leakage Testing for Water-Cooled Power Reactors
 - 3) Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995
 - 4) NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J", dated July 26, 1995
 - 5) NRC letter to Nuclear Energy Institute (NEI), NRC Adjustments to Industry's Proposed Technical Specifications for Implementing Option B of Appendix J, dated November 2, 1995
 - 6) Standard ANSI/ANS-56.8-1994, American National Standard for Containment System Leakage Testing Requirements
 - 7) Detroit Edison Letter to NRC, "Request for One-Time Exemption from 10 CFR Part 50, Appendix J, Paragraphs III.D.2.a and III.D.3 Scheduler Requirements," NRC 95-0083, dated September 1, 1995
 - 8) Detroit Edison Letter to NRC, One Time Technical Specification Revision to Allow Extension of the Fermi 2 Operating Cycle," NRC-95-0096, dated September 20, 1995

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- 9) NUREG-1493, Performance-Based Containment Leakage-Test Program
- 10) Final Regulatory Impact Analysis, Performance-Based Containment Leakage-Test Program (Attachment 2 to NRC Rulemaking Issue Affirmation, SECY-95-181 dated July 17, 1995, Final Amendment to 10 CFR Part 50, Appendix J, "Containment Leakage Testing," to Adopt Performance-Oriented and Risk-Based Approaches)

Subject: Proposed Technical Specification Change (License Amendment) - Implementation of 10 CFR Part 50 Appendix J Option B

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed changes into the plant Technical Specifications. The proposed changes implement Option B of the recently revised 10 CFR Part 50 Appendix J (Appendix J) as described in the Reference 2 Final Rule announcement. Except for previously approved exemptions, the proposed changes implement Option B of Appendix J in a manner consistent with Regulatory Guide 1.163 (Reference 3) and NEI 94-01, Revision 0 (Reference 4), and are generally consistent with the latest available NRC Technical Specification change model (Reference 5). The following previously approved exemptions to the original Appendix J requirements have been retained and are reflected in the proposed Technical Specifications:

- reduced pressure for MSIV testing (3.6.1.2.c)
- LPCI injection isolation valves tested in accordance with TS 4.4.3.2.2 (4.6.1.2)

References to the past one-time schedule exemption have been deleted. In addition, the exemptions previously granted for Type A data analysis methods and the testing of airlocks after each opening are no longer needed with the Regulatory Guide 1.163 and NEI 94-01 methodology, and are no longer discussed in the Technical Specifications.

A summary of the proposed changes, an Evaluation, the Significant Hazards and Environmental Impact Considerations, and a Conclusion are provided in Attachment 1. Attachment 2 provides a typed version of the affected Technical Specification pages with the proposed changes incorporated.

In the Reference 7 letter, Detroit Edison requested a one-time exemption from 10 CFR 50, Appendix J, Paragraphs III.D.2.a and III. D.3, which require, in part, Type B and C tests to be performed at intervals no greater than 2 years. The Reference 7 letter further explained that:

- Detroit Edison is postponing the spring 1996 refueling outage until September 27, 1996. This will allow targeted fuel burnup to be met, so Cycle 6 operation can be conducted as planned.
- Type B and C tests will need to be conducted prior to the September 1996 refueling outage unless an exemption is granted.
- The one-time exemption requested would allow a 25% extension to the 2 year testing interval, resulting in a maximum Type B and C test interval of 30 months (applied to all Type B and C tests, with the exception of airlocks). The request represents a postponement, not elimination, of the Type B and C tests.
- Without this exemption Type B and Type C testing would need to be performed twice in 1996, during a mid-cycle shutdown and fall refueling outage, leading to significant additional radiation exposure and cost.
- The request meets the cost and safety criteria for a Cost Beneficial Licensing Action since it involves greater than \$100,000 in savings and, involves minimal safety significance. However, Detroit Edison requested that it be assigned a Priority 1 ranking since it is an exemption request to prevent reactor shutdown.
- The proposed extension of the test interval conforms to the most limiting test interval that would be required by the proposed rule.
- Detroit Edison requested the exemption with the expectation that the final rule would be approved before the end of 1995. However, Detroit Edison felt it prudent to request the schedule exemption to allow the NRC sufficient time for review in the event that either the final rule was delayed or a Technical Specification change implementing the rule could not be approved before the exemption was needed in April 1996.

- When the proposed rule is approved, Detroit Edison plans to implement the rule change, including performance based test intervals.

Detroit Edison requests that the enclosed proposed changes to the Technical Specifications be approved by March 1, 1996 so that the Type B and C testing that would be required starting April 1996 under the existing Appendix J requirements can be performed during the RFO5 outage scheduled to begin in September 1996. Type B and C testing could be performed at that time in accordance with the new Appendix J Option B provisions without any schedular exemptions. The circumstances described in the Reference 7 letter regarding the need for schedular relief by April 1996 remain unchanged. Approval by March 1, 1996 would be appreciated to facilitate outage scheduling.

If the enclosed proposed Technical Specifications can be approved by March 1, 1996, the Type B and C one-time schedule exemption as requested by Reference 7 will not be needed. However, if the enclosed Technical Specifications cannot be approved by that time, Detroit Edison requests that the Reference 7 schedule exemption request be approved as an interim measure for Type B and C testing by March 1, 1996, and that the enclosed proposed Technical Specifications be approved by August 1, 1996. Approval of the Technical Specifications implementing Appendix J Option B is desired by that time to support both deferring the Type A ILRT that would be required during RFO5 to a future outage, as would be allowed by Appendix J Option B, as well as permanently implementing performance-based test intervals for the Type B and C tests.

This request meets the cost and safety criteria for a Cost Beneficial Licensing Action since it involves greater than \$100,000 in savings and has a minimal effect on safety, as discussed in Attachment 1. However, prompt approval of this Technical Specification change or the exemption request is requested in order to prevent an untimely outage in April 1996 and resultant radiation exposure received and cost incurred performing certain Type B and C testing twice in 1996.

Reference 8 provided a proposed one-time Technical Specification revision to allow extension of Technical Specification surveillance intervals to prevent the need for a spring surveillance outage since the refueling outage was postponed until September 1996. This proposed revision and Reference 8 both affect Section 4.6.1.2. If this change is approved first, the changes proposed in Reference 8 to Section 4.6.1.2.i, and the line entries in proposed Table 4.0.2-1 involving Surveillance Requirements 4.6.1.2.b, 4.6.1.2.d, and 4.6.1.2.g are not needed since the Surveillance Requirements sections are being deleted from the Technical Specifications in this proposal. If the Reference 8 change is approved

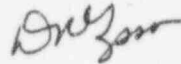
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first, when this proposed revision is approved, Surveillance Requirements 4.6.1.2.b, 4.6.1.2.d and 4.6.1.2.g should be removed from Table 4.0.2-1.

Detroit Edison has evaluated the proposed Technical Specification changes against the criteria of 10CFR50.92 and determined that No Significant Hazards Consideration is involved. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specification revisions and concurs with the enclosed determinations. In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

No specific commitments are being made in this letter. If you have any questions, please contact Mr. Robert Newkirk at (313) 586-4211.

Sincerely,

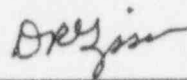


Enclosures

cc: T. G. Colburn
H. J. Miller
M. Jordan
A. Vogel
Supervisor, Electric Operators, Michigan
Public Service Commission - J. R. Padgett

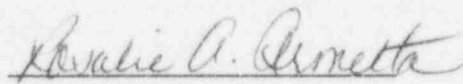
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I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



DOUGLAS R. GIPSON
Senior Vice President

On this 21st day of December, 1995 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

ROSALIE A. ARMETTA
NOTARY PUBLIC - MONROE COUNTY MI
MY COMMISSION EXPIRES 10/11/99

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ATTACHMENT 1

**PROPOSED TECHNICAL SPECIFICATION CHANGE
(LICENSE AMENDMENT)**

**REVISIONS TO THE TECHNICAL SPECIFICATIONS TO IMPLEMENT
10 CFR 50 APPENDIX J OPTION B
PERFORMANCE-BASED CONTAINMENT LEAK RATE TESTING**

INTRODUCTION

This license amendment proposes changes to the Containment Systems and the Procedures and Programs sections of the Fermi 2 Technical Specifications (TS). The changes, which affect the following sections of the Fermi 2 TS, are made to implement the performance-based option (Option B) of the recently revised Appendix J of 10 CFR Part 50 (Reference 2):

Index	(pagination affected page numbers for 6.9.1 topics)
3/4.6.1.2	Primary Containment Leakage
4.6.1.3	Primary Containment Airlocks
4.6.1.5.1	Primary Containment Structural Integrity
B3/4.6.1.2	Bases - Primary Containment Leakage
B3/4.6.1.3	Bases - Primary Containment Airlocks
B3/4.6.1.5	Bases - Primary Containment Structural Integrity
B3/4.6.1.8	Bases - Drywell & Suppression Chamber Purge System
6.8.5.g	Primary Containment Leakage Rate Testing Program

Except for previously approved exemptions, the proposed changes implement Option B of Appendix J in a manner consistent with Regulatory Guide 1.163 (Reference 3) and NEI 94-01, Revision 0 (Reference 4), and are generally consistent with the latest available NRC Technical Specification change model (Reference 5). Differences between the Reference 5 model and the proposed Fermi 2 TS are generally due to the differences between the base technical specifications to which the changes are made.

A previously approved exemption to the original Appendix J requirements concerning reduced pressure for MSIV testing has been retained in Section 3.6.1.2.c. In addition, an approved exemption to test the LPCI Loop A and B Injection Isolation valves in accordance with Technical Specification 4.4.3.2.2 in lieu of the Type B and C Appendix J LLRT requirements has been maintained in the proposed changes.

References to four previously granted exemptions have been deleted from the proposed Fermi 2 TS because these exemptions are not required under the new 10 CFR Part 50 Appendix J Option B regulations. These exemptions include two one-time schedule exemptions, the exemption for Type A data analysis methods, and the exemption for testing of airlocks after each opening. The latter two are no longer needed due to the added flexibility afforded by Regulatory Guide 1.163 and the NEI 94-01 methodology.

DISCUSSION

In the Reference 7 letter, Detroit Edison requested a one-time exemption from 10 CFR 50, Appendix J, Paragraphs III.D.2.a and III. D.3, which require, in part, Type B and C tests to be performed at intervals no greater than 2 years. The Reference 7 letter further explained that Detroit Edison requested the exemption with the expectation that the final rule would be approved before the end of 1995. However, Detroit Edison felt it prudent to request the schedule exemption to allow the NRC sufficient time for review in the event that either the final rule was delayed or a Technical Specification change implementing the rule could not be approved before the exemption was needed in April 1996. The letter also stated that when the proposed rule is approved, Detroit Edison planned to implement the rule change, including performance-based test intervals.

This submittal contains the proposed Technical Specification changes described in the Reference 7 letter that will implement the Appendix J rule change. This request meets the cost and safety criteria for a Cost Beneficial Licensing Action since it involves greater than \$100,000 in savings and has a minimal effect on safety, as discussed in the Significant Hazards Consideration.

PROPOSED CHANGES

Attachment 2 provides a typed version of the affected Technical Specification pages with the proposed changes incorporated. Each of the proposed changes is described in the following paragraphs. In addition to the proposed changes described, a revised index is provided in Attachment 2 that reflects a page change for the Startup Report description in Section 6.9.1 that resulted from a pagination change.

3/4.6.1.2: Primary Containment Leakage

Detroit Edison proposes to revise the Specification 3.6.1.2 limits, conditions, and actions to refer to the Primary Containment Leakage Rate Testing Program (as defined in new proposed Specification 6.8.5.g) and to delete the test pressure value. The test pressure value has been defined in the new Specification 6.8.5.g at the present value of 56.5 psig. This change, therefore, does not result in any functional changes to the Technical Specification, but relocates certain specific information to the program description. The approved exemptions to Appendix J of 10 CFR Part 50 permitting MSIV testing at 25 psig and excluding the MSIVs from the combined leakage rate summation have been retained in the proposed revision.

Detroit Edison proposes to revise the Specification 4.6.1.2 Surveillance Requirements to refer to the Primary Containment Leakage Rate Testing Program (as described in new proposed Specification 6.8.5.g) and to delete all detailed technical information related to the performance and associated limits of the Type A, B, and C Tests. The Specification retains the clarification that the LPCI Loop A and B Injection Isolation valves are not tested as part of the Program, but rather in accordance with Specification 4.4.3.2.2. The exclusion is a previously approved exemption. This change implements Option B of the 10 CFR Part 50 Appendix J requirements through reference to the Program.

Additionally, if the Reference 8 proposed change has been approved prior to approval of this revision, a revision to proposed Table 4.0.2-1 is to be made as described below to delete references to Surveillance Requirements that have been deleted by this letter (4.6.1.2.b, 4.6.1.2.d, & 4.6.1.2.g).

4.6.1.3 : Primary Containment Airlocks

Detroit Edison proposes to revise the Specification 4.6.1.3 Primary Containment Airlock Specifications to reflect the 10 CFR Part 50 Appendix J Option B performance-based regulations. The 7-day after each closing, 30-day after multiple entries, and 30-month periodic surveillance intervals are based on Section 10.2.2.1 of NEI 94-01, Revision 0 (Reference 4), the implementation document referenced and endorsed by Regulatory Guide 1.163 (Reference 3). The proposed Section 4.6.1.3 Specifications specify the intervals rather than referencing the Program for definition and guidance because, unlike the ILRT and LLRT testing that is scheduled and performed as part of the in-service testing activities, use of the airlocks is controlled by plant operations personnel on a day-to-day basis. The footnote stating that the provisions of Specification 4.0.2 are not applicable has been retained.

4.6.1.5.1: Primary Containment Structural Integrity

Detroit Edison proposes to revise the Specification 4.6.1.5.1 to implement the Regulatory Guide 1.163 (Reference 3) Regulatory Position C.3 explicitly in the Technical Specifications. This Position requires that if the Type A test interval is extended to 10 years, that visual inspections supporting this Surveillance Requirement be conducted prior to the Type A test and during two other refueling outages before the next Type A test. The details concerning the performance-based extension of the Type A test interval are addressed outside the Technical Specifications by the Primary Containment Leakage Rate Testing Program.

B3/4.6.1.2: Bases - Primary Containment Leakage

B3/4.6.1.3: Bases - Primary Containment Airlocks

Detroit Edison proposes to revise the Bases for Specifications 3/4.6.1.2 and 3/4.6.1.3 to reflect the new basis for the Primary Containment Leakage Rate Testing Program by including references to 10 CFR Part 50 Appendix J (Reference 2), Option B and its key implementing documents, Regulatory Guide 1.163 (Reference 3) and NEI 94-01, Revision 0 (Reference 4). The revised Bases also incorporate the 1994 version of the ANSI/ANS industry standard 56.8-1994, which is referenced by and provides a significant portion of the basis for the Reference 4 NEI document.

The revised Bases for Specification 3/4.6.1.2 reflects that ANSI/ANS 56.8-1994 provides additional flexibility over earlier versions of the same standard and N45.4-1974 (the basis for Type A tests conducted in accordance with the earlier version of Appendix J), and eliminates the need for an approved exemption allowing alternative techniques to the mass plot method for analyzing Type A test data.

B3/4.6.1.5: Bases - Primary Containment Structural Integrity

Detroit Edison proposes to revise the Bases for Specification 3/4.6.1.5 to tie the visual inspections for containment integrity to the Primary Containment Leakage Rate Testing Program rather than to the Type A tests. This is consistent with Regulatory Guide 1.163 Position C.3 and the proposed changes to Specification 4.6.1.5.1.

B3/4.6.1.8: Bases - Drywell & Suppression Chamber Purge System

During the review of the Appendix J Program Technical Specifications, a typographical error was noted in the bases regarding the allowable measured leakage rate for purge valves. This editorial correction does not change the technical basis or intent of the existing Technical Specification; it is strictly an editorial correction to achieve consistency between the bases and specifications.

6.8.5.g : Primary Containment Leakage Rate Testing Program

Detroit Edison proposes to revise Specification 6.8.5 to define and describe the Primary Containment Leakage Rate Testing Program. The program description is added as item 6.8.5.g. The proposed new section defines the Program in terms of 10 CFR Part 50 Appendix J (Reference 2), Option B and Regulatory Guide 1.163 (Reference 3). In addition, the peak

calculated containment internal pressure for the design basis LOCA and the maximum allowable primary containment leakage rate were relocated from portions of the Technical Specification that were deleted by this proposed change.

Table 4.0.2-1: Surveillance Test Intervals Extended to October 5, 1996

This table was proposed to be added by the Reference 8 change request; therefore, the attached changes need to be made only if the changes proposed by Reference 8 are approved prior to this proposed change. In this case, the enclosed changes to Table 4.0.2-1 delete reference to Surveillance Requirements 4.6.1.2.b, 4.6.1.2.d, and 4.6.1.2.g since they will be deleted from Section 4.6.1.2 by this revision. This is an editorial change only.

EVALUATION

This proposal implements the revised 10 CFR Part 50 Appendix J (Reference 2) Option B performance-based containment leakage test requirements through establishing the Primary Containment Leakage Rate Testing Program, relocating much of the technical detail for implementing the required containment testing outside the Technical Specification into the Program, and incorporating selected details of the program explicitly within the Technical Specifications. Relocating these details will allow Fermi 2 to administratively control changes to these provisions without having to submit Technical Specification changes for NRC approval, while still meeting the regulatory requirements and Regulatory Guide 1.163, as stated in the proposed description of the Primary Containment Leakage Rate Testing Program. Except for previously approved exemptions, the proposed Fermi 2 Technical Specifications and the associated Primary Containment Leakage Rate Testing Program implement the revised Appendix J requirements consistent with Regulatory Guide 1.163 (Reference 3) and NEI 94-01 Revision 0 (Reference 4), and are generally consistent with the latest NRC Technical Specification change model for implementing the revised Appendix J requirements (Reference 5). As discussed in the Significant Hazards Consideration evaluation below, these changes affect only the frequency at which containment leak rate tests are performed, represent a minimal incremental theoretical risk, and at the same time, have the potential of reducing occupational risk due to reduction in radiation exposure of plant workers who perform containment leakage tests.

SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10CFR50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards considerations. To make this determination, Detroit Edison must establish that operation in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

- 1) This request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change implements the new Option B of 10 CFR Part 50 Appendix J on performance-based containment leakage testing. The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that contribute to initiation of any accidents previously evaluated. Thus, the proposed change cannot increase the probability of any accident previously evaluated.

The proposed change potentially affects the leak-tight integrity of the containment structure designed to mitigate the consequences of a loss-of-coolant accident (LOCA). The function of the containment is to maintain functional integrity during and following the peak transient pressures and temperatures which result from any loss-of-coolant accident (LOCA). The containment is designed to limit fission product leakage following the design basis LOCA. Because the proposed change does not alter the plant design, only the frequency of measuring Type A, B, and C leakage, the proposed change does not directly result in an increase in containment leakage. However, decreasing the test frequency can increase the probability that an increase in containment leakage could go undetected for an extended period of time. Test intervals will be established based on the performance history of components being tested. The risk resulting from the proposed changes is characterized as follows, based primarily on the results contained in NUREG-1493, the principal Technical Support Document used by the NRC as the basis for the Appendix J final rule (Reference 9) and the NRC's Final Regulatory Impact Analysis as contained in SECY-95-18i (Reference 10):

Type A Testing

NUREG-1493 found that the effect of containment leakage on overall accident risk is minimal since risk is dominated by accident sequences that result in failure or bypass of the containment.

Industry wide, ILRTs have only found a small fraction of the leaks that exceed current acceptance criteria. Only three percent of all leaks are detectable only by ILRTs, and therefore, by extending Type A testing intervals, only three percent of all leaks have a potential for remaining undetected for longer periods of time. In addition, when leakage has been detected by ILRTs, the leakage rate has been only marginally above existing requirements. The Fermi Type A testing confirms the industry-wide experience that a majority of the leakage experienced during Type A testing is through components tested by Type B and C tests.

NUREG-1493 found that these observations, together with the insensitivity of reactor accident risk to the containment leakage rate, show that increasing the Type A leakage test intervals would have a minimal impact on public risk.

Type B and C Testing

NUREG-1493 found that while Type B and C tests can identify the vast majority (greater than 95 percent) of all potential leakage paths, performance-based alternatives to current local leakage-testing requirements are feasible without significant risk impacts. The risk model used in NUREG-1493 suggests that the number of components tested would be reduced by about 60 percent with less than a three-fold increase in the incremental risk due to containment leakage. Since, under existing requirements, leakage contributes less than 0.1 percent of overall accident risk, the overall impact is very small. In addition, the NRC's Final Regulatory Impact Analysis concluded that while the extended testing intervals for Type B and C tests led to minor increases in potential offsite dose consequences, the beneficial expected decrease in onsite (LLRT & ILRT worker) dose exceeds (by at least an order of magnitude) the potential off-site dose consequences.

The editorial change to the bases has no impact on the probability or consequence of an accident since it is strictly a correction to achieve consistency between the bases and the specifications.

Based on the above, DECO has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously evaluated.

- 2) The request does not create the possibility of occurrence of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to initiation of any accidents. This change involves the reduction in Type A, B, and C test frequency. Except for the method of defining the test frequency, the methods for performing the actual tests are not changed. No new accident modes are created by extending the testing intervals. No safety-related equipment or safety functions are altered as a result of this change. Extending the test frequency has no influence on, nor does it contribute to, the possibility of a new or different kind of accident or malfunction from those previously analyzed.

The editorial change to the bases has no effect on any kind of accident since it is strictly a correction to achieve consistency between the bases and the specifications.

Based upon the above, DECO has concluded that the proposed change will not create the possibility of a new or different kind of accident previously evaluated.

- 3) The request does not involve a significant reduction in a margin to safety.

The proposed change only affects the frequency of Type A, B, and C testing. Except for the method of defining the test frequency, the methods for performing the actual tests are not changed. However, the proposed change can increase the probability that an increase in leakage could go undetected for an extended period of time. NUREG-1493 has determined that, under several different accident scenarios, the increased risk of radioactivity release from containment is negligible with the implementation of these proposed changes.

The margin of safety that has the potential of being impacted by the proposed change involves the offsite dose consequences of postulated accidents which are directly related to containment leakage rate. The containment isolation system is designed to limit leakage to L_a , which is defined by the Fermi 2 Technical Specifications to be 0.5 percent by weight of the containment air

per 24 hours at 56.5 psig (P_a). The limitation on containment leakage rate is designed to ensure that total leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure (P_a). The margin to safety for the offsite dose consequences of postulated accidents directly related to the containment leakage rate is maintained by meeting the 1.0 L_a acceptance criteria. The L_a value is not being modified by this proposed Technical Specification change.

Except for the method of defining the test frequency, no change in the method of testing is being proposed. The Type B and C tests will continue to be done at full pressure (P_a) or greater with the exception of the Main Steam Isolation Valves, which have an approved exemption. Other programs are in place to ensure that proper maintenance and repairs are performed during the service life of the primary containment and systems and components penetrating the primary containment.

The editorial change to the bases has no effect on the margin of safety since it is strictly an editorial change to achieve consistency between the bases and the specifications.

As a result, DECO has concluded that the proposed change will not result in a significant reduction in the margin of safety.

Based upon the above, Detroit Edison has concluded that the proposed change does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT - CATEGORICAL EXCLUSION

Detroit Edison has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures.

The proposed Technical Specification changes implement an alternative approach to confirm the operability of the primary containment to perform its function to withstand the effects of the limiting design basis Loss of Coolant Accident (LOCA) and to assure that containment leakage is within design limits, should the design basis LOCA occur. The changes have no effect on the magnitude or makeup of the normal operation or accident effluent source term because allowable leakage has not been increased, and do not affect the plant response to a

postulated design basis LOCA. Therefore, the magnitude and effect of offsite releases would remain within existing analyzed limits.

The changes, however, have the potential to reduce future in-plant occupational exposure if the performance-based testing intervals are extended beyond the present fixed periodic intervals, as is expected following their implementation.

Based on the foregoing, Detroit Edison concludes that the proposed Technical Specifications meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

IMPLEMENTATION PLAN

Detroit Edison requests that the proposed license amendment be effective within 60 days after approval by the Commission. This will allow time for implementing the Program and associated administrative controls. Prior to using extended intervals for certain components in excess of ASME Section XI test interval limits, a Relief Request will be submitted and approval obtained.

CONCLUSION

Based on the evaluations above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the proposed amendment will not be inimical to the common defense and security or the health and safety of the public.