

January 24, 1996

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

SUBJECT: PROPOSED CHANGES TO ADMINISTRATIVE CONTROLS SECTION OF THE FERMI 2
TECHNICAL SPECIFICATIONS (TAC NO. M91189)

Dear Mr. Gipson:

On December 15, 1994, the Detroit Edison Company (DECo) proposed changes to the administrative controls section (Section 6.0) of the Fermi 2 Technical Specifications (TS). The proposed changes would modify Section 6.0, removing or relocating requirements that are adequately controlled by existing regulations other than 10 CFR 50.36 and the TS. Subsequent to your December 15, 1994, application, the NRC issued Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995. The staff has reviewed your submittal to ensure consistency with the improved standard TS (iSTS), pending changes to the iSTS and AL 95-06. Based on our review, we have determined that DECo should modify the proposed TS change as indicated in the enclosure in order to be consistent with the above mentioned guidance.

Should you have any questions on this matter, please contact me at (301) 415-1341.

This requirement affects nine or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by

Timothy Colburn, Sr. Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosure: Guidance to Proposed Technical
Specifications Changes on
Administrative Controls

Docket No. 50-341

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Mr. Douglas R. Gipson
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GUIDANCE TO PROPOSED TECHNICAL SPECIFICATIONS
CHANGES ON ADMINISTRATIVE CONTROLS

Detroit Edison Company (DECo) will have to modify its license amendment to change the proposed Administrative Controls to be consistent with the improved Standard Technical Specifications (iSTS) or pending changes to the iSTS, as described below. The review of the license amendment relative to the relocation of quality assurance (QA) requirements can be facilitated by licensee references to an existing QA program (QAP) commitment that explicitly addresses the current TS provisions or the simultaneous submittal of a revision of the QAP that incorporates the relocated TS requirements. The review process is less complicated if the requirements are relocated intact to the QAP. The licensee shall submit an updated QAP simultaneously with the submittal of a revised administrative controls license amendment request. For those current TS requirements that are duplicated in accepted industry standards, reference to those standards is sufficient. Any future changes to these requirements proposed after the relocation to the QAP may then be performed in accordance with 10 CFR 50.54(a).

- 1) Reportable Event Action: DECo's proposal to relocate the Onsite Review Organization (OSRO) reportable action requirement in TS 6.6.1.b to the updated final safety analysis report (UFSAR) is acceptable. In addition, it is acceptable for the licensee to remove TS 6.6.1.a on performing reporting requirements in accordance with 10 CFR 50.73, since this is a redundant requirement. DECo should revise the license amendment request to entirely delete TS 6.6.1.
- 2) Administrative Controls on Working Hours: The following action is required by DECo for its proposal to relocate the administrative controls related to working hours to be acceptable. The following paragraphs must be retained in the Administrative Controls section, requiring procedures.

"Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the [Plant Superintendent] or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the [Plant Superintendent] or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized."

3) Independent Safety Engineering Group (ISEG):

DECO should revise its proposal to relocate the ISEG requirements from the UFSAR to the QAP. At the present time, the QAP does not include the ISEG provisions. This amendment cannot be accepted until the ISEG provisions are appropriately incorporated into the QAP. As a minimum, the QAP should include a commitment related to the functions of the ISEG organization described in the relocated TS to a level of detail comparable to that previously contained in the TS. The review process is less complicated if the existing TS ISEG requirements are relocated intact to the QAP. The review of any license amendments related to the relocation of the ISEG function will be facilitated by the licensee's simultaneous submittal of a revision of the QAP which incorporates the ISEG functions. Any subsequent changes to the ISEG provisions incorporated into the QAP would be performed in accordance with 10 CFR 50.54(a). The staff can respond to any question on the ISEG relocation.

4) Unit Staff Qualifications: The licensee proposal to relocate unit staff qualification requirements from the administrative controls, TS Section 6.3, is unacceptable. The following requirement related to unit staff qualifications must be retained in the Administrative Controls section:

"Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975."

5) Review and Audit:

The licensee must relocate the existing TS provisions related to review and audit function intact, or capture existing structural and administrative requirements with a description of the review and audit organizations and reference the appropriate industry QA standards such as American National Standards Institute (ANSI) standard N18.7 that explicitly address the current TS provisions. The licensee must also commit to incorporate a 2-year limit on performance-based audit schedules, in accordance with ANSI N-18.7, and retain the existing [annual] frequency for audits of the fire protection program on a fixed basis. The staff can respond to any questions related to the associated changes to the QAP.

6) Review and Approval Process and Temporary Change Process:

As a minimum, the QAP should include a commitment to process procedures and procedure changes in accordance with an accepted standard such as ANSI N18.7. Site-specific aspects currently in TS, that do not duplicate ANSI N18.7 provisions, should be relocated to the QAP. Relocation of the TS requirements intact to the QAP simplifies the NRC license amendment review. Any subsequent changes to these provisions may then be performed in accordance with 10 CFR 50.54(a). At the present time, the QAP does not include the performance-based audit provisions. This amendment

cannot be accepted until the audit provisions are appropriately incorporated into the QAP. The staff can respond to any questions related to the associated changes to the QAP.

7) Process Control Program (PCP):

The licensee must ensure that the revision and approval process for the PCP currently specified in TS Section 6.13 is in the QAP.

8) Record Retention:

The existing TS sections related to record retention are to be relocated from the TS to the QAP. As mentioned above, the review process is less complicated if the existing TS requirements related to records retention are relocated intact to the QAP. At the present time, the QAP does not include the performance-based audit provisions. This amendment cannot be accepted until the audit provisions are appropriately incorporated into the QAP. The staff can respond to any questions related to the associated changes to the QA Program.

9) High Radiation Area: DECo proposed to relocate requirements in TS Section 6.12 for high radiation areas to the UFSAR. These alternative methods for controlling high radiation areas need to have prior NRC approval, consistent with 10 CFR 20.1601. Therefore, control within the Administrative Controls section of the TS is warranted and requirements related to high radiation areas should be retained to the level of detail recommended in Revision 1 to NUREG-1433, "Standard Technical Specifications for General Electric Plants, BWR/4."