Wayne H. Jens
Vice President
Nuclear Operations

Detroit Edison

Fermi-2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-4150

August 24, 1984
EF2-72,770

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois   60137

Dear Mr. Keppler:

Reference: Fermi 2
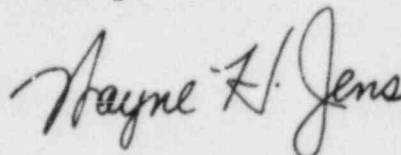   NRC Docket No. 50-341

Subject: Inspection Report No. 50-341/84-15

With this letter, we are providing the information you
requested in your letter of July 27, 1984 transmitting
Inspection Report No. 50-341/84-15. This report describes
the findings of the routine safety inspection of the Fermi 2
Radiological Emergency Response Plan exercise conducted by
Region III at Fermi 2 on June 25-29, 1984.

The enclosed response describes our planned actions for
completing each of the items in the Appendix, Exercise
Weaknesses, of your letter.

We trust this response will satisfactorily address your
request. If you have questions regarding this matter,
please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

Wayne H. Jens

cc: Mr. P. M. Byron
     Mr. F. Kantor
     Mr. R. C. Knop
     Mr. J. P. Patterson

AUG 3 0 1984

THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

Response to NRC Report 50-341/84-15

Docket No. 50-341   License No. CPPR-87

Inspection at: Fermi 2, Newport, Michigan

Inspection Conducted: June 25, 1984 through June 29, 1984

EXERCISE WEAKNESS 341/84-15-01

Protective action recommendation formulation failed to incorporate reactor and containment conditions and prognosis for improvement (or degradation), evacuation time estimates, and plume passage time. Instead, dose assessment calculations were based on an eight-hour projected release rate. Procedures should be modified to ensure that all available information regarding dose assessment and reactor/containment conditions is factored into the formulation of protective action recommendations. (341/84-15-01)

RESPONSE

The Fermi-2 Radiological Emergency Response Preparedness Plan Implementing Procedure EP-545, Protective Action Guideline (PAG) Recommendations, contains the elements suggested in the above statement. In fact, containment status was factored into the Protective Action Recommendations during FERMEX '84.

The procedure covers information/data input for use of PAG flowchart. This information/data includes plant status and prognosis; evacuation constraints based on evacuation time estimates and plume travel/arrival time; sheltering effectiveness, including shielding factors for various structures; and maps showing the location of schools, hospitals, nursing homes, recreational areas, and dairy farms within the 10-mile EPZ.

EP-545 will be reviewed in detail during requalification training. Those individuals in the Emergency Response Organization who are involved in recommending protective actions to the offsite authorities will be thoroughly trained on all aspects of EP-545.

EXERCISE WEAKNESS 341/84-15-02

Offsite monitoring teams were not provided with respiratory protection equipment. Although no radioiodines or particulates were present in the release, this equipment should be provided to ensure internal organ doses would be as low as reasonably achievable had radioiodines or particulates been present. (341/84-15-02)

RESPONSE

Nuclear Operations has a directive, NOD-24, Basic Policy Regarding the Use of Respirators, which establishes policy at Fermi-2 on the use of respirators so that inhalation of airborne radioactive materials by personnel is limited to levels that are as low as reasonably achievable (ALARA).

Should there be a particulate release, as indicated by the plant effluent monitoring equipment, Onsite RETs will be dispatched from the plant with proper training and respiratory equipment to monitor the plume. The offsite RETs will be removed from the influence of the plume. The appropriate Implementing Procedure will be revised accordingly. For radioiodine protection, personnel use KI as advised by the Medical Department.