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December 12, 1984
EF2-72028

Director of Nuclear Reactor Regulation
Attention: Mr T. M. Novak, Assistant Director
for Licensing
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Novak:

- Reference: (1) Fermi 2
NRC Docket No. 50-341
- (2) NRC letter to Detroit Edison, "Enrico Fermi
Atomic Power Plant, Unit 2 - Draft License"
dated November 27, 1984

Subject: Comments on Draft Operating License

In response to Reference 2, Detroit Edison has reviewed the draft Operating License for Fermi-2 and comments are provided in Attachment A. As Edison is provided drafts of elements of the license not reflected in Reference 2, additional comments may be forthcoming.

Please direct any questions to Mr. O. K. Earle at (313) 586-4211.

Sincerely,

cc: (All with Attachments)
Mr. P. M. Byron
Mr. R. C. Knop (NRC-RIII)
Mr. M. D. Lynch
Mr. J. N. Reyes Jr. (NRC-RIII)
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ATTACHMENT A: Detroit Edison

Comments on Draft OL

1. Paragraph: Entire License

Discussion: The draft Operating License (OL) references the plant as "Enrico Fermi Atomic Power Plant, Unit 2". In accordance with Edison's transmittal letter for Amendment 53 to the OL application and FSAR (dated February 22, 1984), the project name was changed to "Fermi-2". The OL should reflect this change.
2. Paragraph: 1.A through 1.I

Discussion: Detroit Edison has no comment
3. Paragraph: 2.A and 2.B (1), (2), (3), and (5)

Discussion: Detroit Edison has no comment
4. Paragraph: 2.B(4)

Discussion: The sentence should be revised to read: "DECo, pursuant to the Act and 10CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any by product, source or special nuclear material..."
5. Paragraph: 2.C (1)

Discussion: Paragraph 2.C (1) addresses the Post-Fuel-Loading Initial Test Program, ie, the Startup Test program. Reference to startup tests in paragraph 2.C (1) should be deleted. Attachment B to this letter provides a list of preoperational tests which may not be completed at fuel load. It is presented as a draft of Attachment 1 to the OL. It is anticipated that the number of post fuel load preoperational tests will decrease. Detroit Edison will keep the NRC informed on the status of this item. Attachment C to this letter provides discussion on the justification of the tests being performed after fuel load.
6. Paragraph: 2.C (2), (3) and (4)

Discussion: Detroit Edison has no comment

7. Paragraph: 2.C (5)

Discussion: This issue was previously discussed in the SER and supplements 1, 3 and 4. SSER 4 closed the discussion of this issue saying: "After the issuance of the generic SER containing the resolution of our concerns in NUREG-0803, the applicant will be required to make any changes necessary to protect the health and safety of the public." (The draft OL references SSER 5 as detailing the license condition. This supplement has not been issued yet.) Edison considers the SSER 4 write-up sufficient since it acknowledges that Edison's response to the generic SER will document how Fermi 2 will address this concern and the current status of this indicates that the level of the concern is such that it does not warrant a license condition [See NRC (Schwencer) to PP & L Letter, "Resolution of BWR Scram Discharge Volume (SDV) Pipe Break, NUREG 0803", October 17, 1984.] If a license condition is considered necessary, it should be revised as follows in order to provide flexibility for acceptable alteration:

"Within two years or prior to startup following the next refueling outage, whichever is later, or on a schedule proposed by DECo acceptable to the NRC after the issuance of the generic SER to licensees resolving the NRC staff concerns in NUREG-0803, DECo shall have implemented the actions and modifications specified by the NRC staff applicable to Fermi 2 which are in its generic SER or acceptable alternatives."

8. Paragraph: 2.C (6)

Discussion: Detroit Edison has no comments

9. Paragraph: 2.C (7) (a)

Discussion: In accordance with the recommendation in Item 10 below to delete Paragraphs 2.C (7) (b) and (c), Paragraph 2.C (7) (a) would require revision to delete the phrase "...subject to provisions (b) and (c) below."

10. Paragraph: 2.C (7) (b) and (c)

Discussion: In accordance with 10CFR50.59, Detroit Edison will notify the NRC of any proposed tests, modifications or experiments that involve a change in the Technical Specifications or an unreviewed safety question either prior to implementation or via an annual report to NRC I & E (as delineated by 50.59). In accordance with 10CFR50.71 (e), Edison will notify NRC-NRR via the annual FSAR revision of changes made to plant or procedures, safety evaluations performed and analyses performed by or for the NRC. Due to the referenced regulations, and the fact that other recently licensed BWRs* do not reflect requirements similar to that provided in paragraphs 2.C (7) (b) and 2.C (7) (c), Edison requests the deletion of these license conditions. In addition, a recommended license condition for installation of the alternative shutdown concept is contained in Detroit Edison to NRC Letter, EF2-72025, December 7, 1984.

11. Paragraph: 2.C (8)

Discussion: This license condition was not provided in the draft OL. SER Section 10.2.2 indicates the license condition will require "...an inspection of the lower pressure turbine discs during the second refueling outage..."

12. Paragraph: 2.C (9)

Discussion: Detroit Edison interprets the phrase "required experience" in the fourth line from the bottom of the license condition to refer to the first sentence of license condition. If this is not the case, clarification is required.

In addition, the 30 day prior reporting requirement in the last sentence does not recognize conditions outside of the control of the utility, ie, an NSOA leaves prematurely. Accordingly, Detroit Edison requests modifying the last sentence as follows:

*Facility licenses reviewed were for LaSalle 1, Grand Gulf 1, Susquehanna 1, and WNP 2.

"The NRC staff shall be notified at least 30 days prior to the release of any special assigned advisor who has been provided in accordance with this program or, as soon as practical, if knowledge of an imminent departure of a shift advisor is not obtained until within the 30 days period."

13. Paragraph: 2.C (10)

Discussion: This license condition was not provided for Edison review in the draft OL. SSER 2, Section 13.5 indicated that: "...the operating license will be conditioned to require the licensee to fully implement and maintain in effect all provisions of these approved plans." This condition appears to be redundant with 10CFR73 and 10CFR 50.54 and, therefore, should not be necessary.

14. Paragraph: 2.C (11)

Discussion: It is Edison's belief that the intent of paragraph 2.C (11)(e) is enveloped by the requirements of 10CFR 50.59 and 10CFR 50.54, paragraph (a) (3). Using "deviation" as a criteria places unnecessary constraints and burdens on the Startup Test Program.

The conduct of the Startup Test Program with the inherent constraints on ascending power levels, provides adequate controls to assure that the health and safety of the public will not be endangered. (Refer to Fermi-2 FSAR, paragraph 14.1.4.7).

It is requested that paragraphs 2.C(11) (e) and (f) be deleted from the Fermi-2 Operating License. Additionally, requirements 2.C.(11)(e) and (f) were not part of the operating licenses for LaSalle Unit 1, Grand Gulf Unit 1, Susquehanna Unit 1 or WPPSS Nuclear Project No. 2.

15. Paragraph: 2.C (12)

Discussion: For clarification, Detroit Edison recommends the following wording to the subject paragraph:

"DECo shall complete related installation, procedures and training and have operational in the Fermi-2 facility, its post-accident sampling system prior to operating the facility at power levels greater than five percent of full power."

16. Paragraph: 2.C (13)

Discussion: As discussed in Detroit Edison to NRC letter EF2-72013, dated November 28, 1984, this license condition should be deleted.

17. Paragraph: 2.C (14) (a)

Discussion: Revision of the second sentence to read as indicated below would clarify the format of the DCRDR to be submitted.

"DECo shall submit a summary report of its DCRDR based on the BWR Owners Group methodology prior to September 30, 1985."

18. Paragraph: 2.C (14) (b)

Discussion: As indicated in Detroit Edison letter to NRC, EF2-72259, dated September 27, 1984, Edison has requested the reprioritization of items 5.5, 5.6, 10.1 and 10.2 to Priority 3 rating. These items, plus the balance of Priority 3 items, will be reported in accordance with this license condition [i.e., Paragraph 2.C (14)]. (Also please note the referenced June 9, 1981 letter should read June 4, 1981.)

19. Paragraph: 2.C (15)

Discussion: Subsequent to Edison's submittal to NRC dated October 11, 1984 (letter number EF2-72271), Edison has received no questions or comments from the NRC

on this issue. The draft OL references SSER 5 which, similiarly, has not been issued. Edison requests an expedited response from the NRC staff so that subsequent discussions might alleviate the need for any license condition.

20. Paragraph: 2.D

Discussion: Similar to exemptions allowed for Appendix G to 10CFR50, the Safety Evaluation Report (including supplements) described other acceptable exemptions. Paragraph 2.D should be revised as follows:

"Exemptions from certain requirements of Appendices G, H and J and Section 50.55(a) to 10 CFR Part 50 are described in the Safety Evaluation Report. The exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, the exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of the exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended the provisions of the Act, and the rules and regulations of the Commission."

It should be also noted in this regard that Detroit Edison to NRC letter, EF2-72283, October 22, 1984 requested another exemption which should be included in SSER 5.

21. Paragraph: 2.E

Discussion: Refer to Edison's comment on Paragraph 2.C (10)

22. Paragraph: 2.F and 2.G

Discussion: Detroit Edison has no comment

Attachment B

ATTACHMENT 1 TO FERMI-2
OPERATING LICENSE NPF-33

The licensee shall complete the following requirements within the schedule noted below:

- a. The licensee shall successfully complete the following preoperational tests before initial criticality:
 - E1010.001 Primary Containment Leak Detection
 - B3100.001 Reactor Recirculation
 - T4500.001 Reactor Building Floor Drain
 - T4804.001 Thermal Recombiners
 - T5000.001 Primary Containment Monitoring (except for oxygen concentration)
 - G1120.001 Waste Collection
 - G1125.001 Floor Drain Collection
- b. The licensee shall successfully complete the following preoperational tests before heatup:
 - C5116.001 Traversing Incore Probe (TIP)
 - N6200.001 Off-Gas
 - V4100.001 Radwaste Building HVAC
 - X4106.001 On-Site Storage Building HVAC
- c. The licensee shall complete P3323.001, Post-Accident Sampling, and E1000.001, ECCS Pipe Leak Detection (moisture sensitive tape), before exceeding 5% power.
- d. The licensee shall complete C9400.001 (SPDS/ERIS) by December, 1985.
- e. The licensee shall complete the oxygen concentration portion of T5000.001 by six (6) months after initial criticality.
- f. The licensee shall complete the following preoperational tests before completion of the warranty run:
 - G1135.001 Liquid and Solid Radwaste

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
E1000.001 ECCS Pipe Leak Detection (moisture-sensitive tape)	This detection system is only applicable to the ECCS suction lines from the torus and is not required for fuel load or the power ascension test program per the Fermi 2 Technical Specifications. Identified and unidentified leak detection functions are addressed by temperature and line-flow increases, sump-level changes, and other methods. This system provides refined leak detection information to assist operator response.	5% power
G1120.001 G1125.001 G1135.001 Liquid and Solid Radwaste	During the interim, a temporary vendor radwaste system will be used. The vendor's Process Control Program and description details of the system were provided to the NRC by letter EF2-71992, dated October 11, 1984. The temporary system meets all process quality requirements and will support the plant needs until the permanent system is installed and tested. The portions of the system necessary to support the vendor radwaste system will be complete before initial criticality.	Warranty Run
B3100.001 Reactor Recirculation	The system logic and interlocks, lube oil subsystem and MG sets will have been tested before fuel load, although not required by Fermi 2 Technical Specifications. The flow and pump operation tests will be performed during startup testing due to the core-configuration limitation, i.e., core P. The preoperational test results will be reviewed and approved between fuel load and initial criticality.	Operational Condition 2, refer to 3.4.1.1 ^a

(a) Typical reference to Fermi 2 Technical Specification paragraph.

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
P3323.001 Post-Accident Sampling System (PASS)	The preoperational testing of PASS will be performed in conjunction with completion of related construction activities. The steps involved with PASS becoming operational have been discussed in detail with NRC Region III and documented in letter EF2-70036, dated October 31, 1984.	5% power
V4100.001 Rad-waste Bldg. HVAC X4106.001 On-site Storage Bldg. HVAC	The subject HVAC systems are necessary to support radwaste processing operations. The preoperational testing should therefore be completed before reactor coolant heatup.	Reactor Coolant Heatup
E1010-001 Containment Leak Detection and T4500-001 Reactor Building Floor Drain	The Drywell/Reactor Building Leak Detection Systems are not required until Initial Criticality (Modes 1, 2 and 3 per Technical Specification 3.4.3.1). Until that time there will be open access to containment for visual detection of leakage plus any leakage will have minimal or no contamination.	Initial Criticality
T4804.001 Thermal Recombiners	The system is not necessary until after initial criticality. The postulated conditions to produce substantial hydrogen through a metal-water reaction and radiolytic decomposition can not exist beforehand.	Operational Condition 2, refer to 3.6.6.1.

POST FUEL LOAD
PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
T5000.001 Primary Containment Monitoring	This system is not necessary unless the plant is operating or there is irradiated fuel.	Operational Condition 2, refer to 3.3.7.5, except for O ₂ concentration which shall be operational six (6) months after initial criticality, refer to 3.10.5.
C5116.001 Traversing In-core Probe (TIP)	The TIP system is used for recalibration of the LPRM detectors and for monitoring the APLHGR, LHGR, MCPR and MFLPD, refer to 3.3.7.7. It serves no function until the reactor is in the power range.	Reactor Coolant Heatup
N6200.001 Off-gas	This system has no function unless the main condenser steam jet air ejectors are in operation, also refer to 3.11.2.4.	Reactor Coolant Heatup
C9400.001 ERIS/SPDS	The schedule for completion of ERIS/SPDS activities has been discussed with the NRC and was documented in letter EF2-71999, dated November 12, 1984.	December 1985