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Vice President
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**Detroit
Edison**

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Newport, Michigan 48166
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February 1, 1985
NE-85-0243

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Youngblood:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Amendment No. 50 Submittal to the Amended
and Substituted Application for Licenses,
dated August 31, 1983

Subject: Additional Basis for Forty-Year Operating
License

In Amendment No. 50, The Detroit Edison Company requested that the NRC issue an Operating License (OL) for Fermi 2 for a term of forty (40) years from the date of issuance of the OL rather than the date of issuance for the construction permit. Subsequent to our request we have had discussions with the Fermi-2 NRC Project Manager that has indicated additional information is required. This letter provides the additional information requested.

Detroit Edison finds that no significant safety or adverse environmental impact is anticipated as a result of the requested change. The following points provide additional justification to support this position:

- (a) The Fermi-2 Plant is located in a rural area where the population growth over the forty-year lifetime is expected to be small.
- (b) Having Fermi-2 Plant available for a forty-year term would maintain system capacity, promote fuel diversification, and defer capital costs and environmental impacts of replacement capacity.

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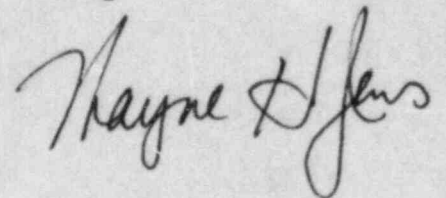
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- (c) Environmental considerations associated with a forty-year operating term do not change significantly. Impacts on the aquatic ecosystem from water use and chemical, thermal, radioactive and other waste discharges derived from continued plant operation, would remain small. Likewise the impact on the terrestrial ecosystem from continued cooling tower operation, radioactive discharge, and land use would also remain very small. In any case, the Environmental Protection Plan for Fermi 2 (which will become Appendix B of the OL) insures that appropriate environmental assessments are performed and satisfactorily reviewed by NRC before proceeding with any operational or design changes which could potentially have adverse environmental impact.
- (d) A forty-year operating term would extend the socioeconomic benefits from operation of the Plant. The creation of direct and indirect jobs and sustained tax benefits would continue to outweigh the small adverse impacts from land use and the continued demand for community services. Accident risks, human health effects and impacts from the balance of the fuel cycle will continue to be low.

The magnitude of the plant impact is not expected to vary significantly over an extended forty-year lifetime. All aspects of the design of Fermi-2 Plant have been chosen to be compatible with a forty-year operating lifetime objective. Specifically, a forty-year plant operating life was assumed as the basis for the Final Safety Analysis Report (FSAR) and Environmental Report (ER) to support our application for a forty-year operating license. Therefore, we ask that when you issue the Fermi-2 Plant Operating License that it be issued for a full 40 year period from the date of issuance of the OL.

Sincerely



cc: Mr. P. M. Byron
Mr. M. D. Lynch
USNRC Document Control Desk
Washington, D. C. 20555