



April 12, 1996
NRC-96-0039

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) NRC Letter to Detroit Edison, "Fermi 2 Proposed
Emergency Action Level Changes (TAC No. M92348),"
dated December 24, 1995

Subject: Submittal of Revision 17 to the Fermi 2 Radiological Emergency
Response Preparedness Plan

Pursuant to 10 CFR 50.54(q), Detroit Edison hereby submits Revision 17 to the
Radiological Emergency Response Preparedness (RERP) Plan.

This revision incorporates the NUMARC/NESP-007, Revision 2, "Methodology for
Development of Emergency Action Levels," based emergency classification scheme
previously submitted and approved for use on December 24, 1995 (TAC No.
M92348). In addition, minor changes to some of the emergency action levels were
made as a result of input from the emergency response organization during the
implementation training program. Detroit Edison plans to implement use of this
new classification scheme this month.

Revision 17 to the RERP Plan has been reviewed in accordance with 10 CFR
50.54(q) and approved by the Onsite Review Organization in accordance with
Technical Specification 6.5. All changes made in this revision subsequent to the
original April 10, 1995 submittal have been reviewed and agreed upon by the State
and local governments in meetings conducted December 15, 1995 and March 18,
1996.

A045'

USNRC
April 12, 1996
NRC-96-0039
Page 2

The changes made in this revision since the December 24, 1995 approval are described in Enclosure 1, "Effectiveness Review Documentation," and do not decrease the effectiveness of the RERP Plan. The RERP Plan, including Revision 17, continues to meet the requirements and standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E. Enclosure 2 is an uncontrolled copy of Revision 17 that includes revision bars to mark the changes.

This information is being submitted in accordance with 10 CFR 50.4(b)(5)(ii). In addition, controlled copies of Revision 17 will be sent under separate cover to the NRC Document Control Desk, the Region III Incident Response Center, and the Site Inspector upon implementation.

If you have any questions, please contact Mr. Hari Arora at (313) 586-4213.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

Enclosures (2)

cc: T. G. Colburn
M. J. Jordan
H. J. Miller (2 copies)
A. Vogel (1 copy)

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
<i>D/Table D-1 pages D-8 through D-55</i>	<i>Rearranged order of initiating conditions within each recognition category so that similar and escalating events are grouped together</i>	<p><i>10CFR50.47(b)(4) and 10CFR50 Appendix E require the development of a standard emergency classification scheme. Reg. Guide 1.101 Rev. 3 endorsed NUMARC/NESP-007, Rev. 2, as guidance for development of the required classification scheme.</i></p> <p><i>LCR 95-034-REP Rev. C was approved 12/12/95 and submitted to the NRC for approval prior to implementation as required by 10CFR50 Appendix E. LCR 95-034-REP Rev. C established a classification scheme in accordance with the guidance of NUMARC/NESP-007.</i></p>

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document		
RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
<i>D/ D-16, 17, 18</i>	<i>Rearranged fission product barrier emergency action levels (EAL) so that they are consistent across barriers</i>	<i>The NRC approved the new classification scheme on 12/24/95(TAC No. M92348)</i>
<i>D/D-16, 17, 18, 39</i>	<i>Changed "Reactor Vessel water level" to "RPV water level" to be consistent with Emergency Operating Procedures (EOPs)</i>	<i>These changes are to clarify and make minor improvements to the EALs. The intent has not been changed in any EAL.</i>
<i>D/D-16, 17, 18</i>	<i>Changed "Drywell Radiation monitoring" to "Containment Radiation" and "Drywell Rad Monitor" to "CHRRM" for consistency</i>	<i>Continued on Page 3</i>
<i>D/D-16</i>	<i>Added reference to also see SU4 to fuel clad barrier EAL 3 due to similar indications</i>	
<i>D/D-17</i>	<i>Added reference to also see SU5 and SA6 to reactor coolant barrier EAL 2 due to similar indications</i>	

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
<i>D/D-18</i>	<i>Added reference to also see SA6 to primary containment barrier EAL 2 due to similar indications</i>	<i>The classification scheme and EALs contained in RERP Plan Section D, Table D-1 as revised, meets the guidance approved by the NRC for development of a classification scheme. Since the scheme meets NRC guidance for development, these changes do not constitute a reduction in the effectiveness of the RERP Plan. Since the RERP Plan continues to contain a classification scheme as required by 10CFR50, the RERP Plan continues to meet regulatory criteria for the plan.</i>
<i>D/D-16, 17, 18</i>	<i>Moved fission product barrier EAL parameter to appropriate column (loss or potential loss) and deleted use of "not applicable" as human factor improvements</i>	

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document		
RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program		
Section/Page	Change	Basis
<i>D/D16, 17, 18</i>	<i>Split the fission product barrier emergency director judgment EAL to be under both loss and potential loss columns.</i>	
<i>D/D-18</i>	<i>Clarified wording of primary containment barrier EAL 2 from "Intentional venting per EOPs" to "Containment venting requiring trip defeat per EOPs"</i>	
<i>D/D-18</i>	<i>Changed Primary Containment barrier EAL 3 potential loss parameter heading from "Drywell Pressure" to "Containment Pressure or Gas Mix" to better reflect EAL indications</i>	

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document		
RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
<i>D/D-19, 20</i>	<i>Changed G to g as proper units of acceleration</i>	
<i>D/D-19, 20</i>	<i>Changed "sustained wind speeds" and "High winds" to "sustained winds" for consistency</i>	
<i>D/D-30</i>	<i>Changed "control of the plant" to "control of RPV level and pressure" for clarification</i>	
<i>D/D-35, 36, 37, 38, 39</i>	<i>Deleted identification of specific diesels and busses associated with divisions 1 and 2 for simplification with no change in intent or meaning</i>	
<i>D/D-37, 38, 39</i>	<i>Changed "one division of emergency busses" to "one full division of emergency busses" to clarify intent</i>	
<i>D/D-40, 41, 42</i>	<i>Deleted reference to annunciators 3D73 and 3D74 because for some failures they may not be received</i>	

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document		
RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
<i>D/D-40, 41, 42</i>	<i>Changed "inserting control rods" to "scram of control rods" to clarify intent of banked rod movement</i>	
<i>D/D-41</i>	<i>Deleted boron injection initiated from EAL as unnecessary</i>	
<i>D/D-44, 45, 46</i>	<i>Deleted references to ERIS/SPDS for clarification as it could have been limiting or misleading</i>	
<i>D/D-50</i>	<i>Deleted colors associated with telephone systems because they are no longer all different</i>	
<i>D/D-51, 52</i>	<i>Changed "battery voltage" to "DC bus voltage" and "DC systems" to "DC bus" for clarification</i>	
<i>D/D-54</i>	<i>Changed EAL to "RPV water level cannot be kept above 0 inches" from "RPV water level less than or equal to 0 inches" to be consistent with EOP wording</i>	
<i>D/D-15, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 48, 49, 51, 52, 53, 54, 55</i>	<i>Replaced "and" and "or" between applicable operating modes with commas for clarification</i>	

EFFECTIVENESS REVIEW DOCUMENTATION
 Radiological Emergency Response Preparedness Plan, Revision 17

Document RERP Plan Revision 17		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
D/D-54	<p><i>Deleted "Loss of Reactor Vessel Water Level" as indicated by Loss of all decay heat removal cooling as determined by 20.205.01, "Loss of Shutdown Cooling" as being unnecessary and potentially confusing for proper classification.</i></p>	<p><i>The deleted portion of the EAL was separated by an "and" statement and "RPV Water Level less than or equal to 0 inches". Loss of shutdown cooling can contribute to the condition of inability to maintain water level that has or will uncover the fuel, but other conditions, such as a LOCA, could result in the condition also and not be due to loss of shutdown cooling. In addition, Fermi 2 has interlocks that isolate the shutdown cooling suction line at a low RPV water level (that is higher than 0 inches) and that was confusing (since shutdown cooling would be "isolated" once level dropped below level setpoint) as previously written. The EAL as revised will successfully classify a loss of shutdown cooling resulting in inability to keep the core covered, or a LOCA as a site area emergency and therefore meets the intent of the NESP-007 guidance.</i></p>