Wayne H. Jens
Vice President
Nuclear Operations

Detroit Edison

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Nuclear Operations

September 27, 1985
RC-LG-85-0051

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

Reference: (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

(2) Detroit Edison to NRC Letter, "Additional Information Concerning Fire Protection", EF2-72025, dated December 7, 1984

Subject: Request for Amendment to Technical Specifications for the Alternative Shutdown Program

In accordance with 10CFR50.90 and the commitment stated in Reference 2, Detroit Edison hereby submits proposed Technical Specifications for the Alternative Shutdown System (Attachment 2) and technical justification (Attachment 1).

We expect to complete installation of the Alternative Shutdown System during our fall outage which will begin no later than October 30, 1985. Our present plan is to end the outage and restart the plant as early as November 10, 1985. To fulfill our commitment to assure that the Alternative Shutdown System is operational prior to startup following the outage, we intend to implement the Technical Specifications as proposed, pending NRC approval. This will include hardware, procedures and training.

Detroit Edison has reviewed the proposed changes per 50.92 and determined that no significant hazards are involved.

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The proposed change will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2) Create the possibility of a new or different kind of accident from any accident previously evaluated, or

3) Involve a significant reduction in the margin of safety.

This request for amendment should be considered with respect to item (ii) of 48 FR 14870 as an amendment not requiring significant hazards considerations in that it imposes additional limitations and restrictions not presently included in the facility Technical Specifications.

Detroit Edison has evaluated this request in accordance with the criteria in 10CFR170.21 and has enclosed an application fee of one hundred fifty dollars ($150.00) as initial payment for this application for amendment under Facility Category A (Power Reactors).

In accordance with 10CFR50.91, the State of Michigan has been provided a copy of this letter.

Should you have any questions in this matter, please contact Mr. A. E. Wegele (313) 586-4210.

Sincerely,

cc: with attachments

Mr. P. M. Byron
Mr. M. David Lynch
Supervisor, Advance Planning and Review Section
Michigan Public Service Commission

I, WAYNE H. JENS, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Wayne H. Jens

WAYNE H. JENS
Vice President
Nuclear Operations

On this 27th day of September, 1985, before me personally appeared Wayne H. Jens, being first duly sworn and says that he executed the foregoing as his free act and deed.

Marcia Buck

Notary Public

MARCIA BUCK
Notary Public, Washtenaw County, MI
My Commission Expires Dec. 28, 1987

acting in Monroe County, Mi

Attachment 1

Technical Justification for Proposed Changes

Detroit Edison committed to install an alternative method of shutting down the reactor in the event of fire damage in certain areas (Edison letters EF2-72001 of 10/22/84, EF2-71994 of 10/22/84 and EF2-72025 of 12/7/84). The proposed method was approved in Supplements No. 5 and 6 to the Fermi 2 Safety Evaluation Report. Edison also committed to submit proposed Technical Specifications for the alternative shutdown system by September 30, 1985.

The Technical Specifications proposed in Attachment 2 define Limiting Conditions for Operation for the Shutdown Panel with its attendant instrumentation and control circuitry consistent with the draft obtained from the NRC staff. In addition, Limiting Conditions for Operation are proposed for several systems utilized in the alternate shutdown scheme but which are not required by the existing Technical Specifications.

The corresponding surveillance requirements are consistent with those committed to in EF2-72001 except the frequency of conducting the Standby Feedwater System flow test has been revised to every 92 days consistent with that for the Reactor Core Isolation Cooling System.

The Limiting Condition for Operation action statements specified for the Standby Feedwater System recognize that only one of the two pumps is required to provide adequate makeup capability as described in EF2-72001. The allowed out of service time is seven days; the same as for the panel itself.

The action statement for loss of the CTG Unit 1 first requires verification that 120 KV offsite power is available to supply power to the shutdown panel. The posting of a fire watch further minimizes the probability of a fire resulting in a challenge to the alternate shutdown system. This availability of the 120 KV power and fire watch are believed to be sufficient to allow a period of up to thirty days in which to either restore the CTG to operable status or provide an alternate supply of power. The alternate supply could be provided either by connecting one of the remaining 3 CTG units to the bus with the CTG unit operating along with dedicated provisions for local control or by supplying an alternate source of power. This time period is consistent with that required in the past to repair CTG units. The requirement to restore the CTG within 60 days or proceed to unit shutdown minimizes the period of operation with the normal means of supplying power to the alternate shutdown system unavailable.

The heat removal capacity of one drywell cooling unit is greater than the rate of heat input to the drywell for the shutdown scenario. The Limiting Condition for Operation and action statement has been written accordingly. The allowed out-of-service time has been selected to be consistent with that for the panel and its associated circuitry.