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10CFR50.54(q)

June 25, 1997 NRC-97-0038

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D. C. 20555

Reference:

Fermi 2

NRC Docket No. 50-341 NRC License No. NPF-43

Subject:

Submittal of Revision 19 to the Fermi 2 Radiological

Emergency Response Preparedness Plan

Pursuant to 10 CFR 50.54(q), Detroit Edison hereby submits Revision 19 to the Radiological Emergency Response Preparedness Plan (RERP Plan).

Revision 19 is the result of a change made to a site specific value of the Fermi 2 Emergency Operating Procedures, which form the basis for the Emergency Action I evels being revised. The subject changes have been discussed and agreed upon with state and local authorities in accordance with Appendix E of 10 CFR 50.

Revision 19 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. The changes made in this revision do not decrease the effectiveness of the Plan as supported by Enclosure 1, Effectiveness Review. The Plan, including Revision 19, 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 19. Revision bars mark the changes.

This information is being submitted in accordance with 10 CFR 50.4(b)(5)(ii). In addition, controlled copies of Revision 19 have been sent under separate cover to the NRC Document Control Desk, the Region III Incident Response Center, and the Senior NRC Resident Inspector.



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If you have any questions, please contact Kevin Morris at (313) 586-4327.

Sincerely,

Norman K. Peterson

Acting Director, Nuclear Licensing

## Enclosures

cc: A. J. Kugler w/ Encl.

A. B. Beach w/o Encl.

M. J. Jordan w/ Encl.

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EFFECTIVENESS REVIEW

## **EFFECTIVENESS REVIEW DOCUMENTATION**

Radiological Emergency Response Preparedness Plan, Revision 19

## Document

RERP Plan Revision 19

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
Table D-1/Page D-16 & 18	Replaced "RPV Water Level less than -43 inches" with "RPV Water Level less than value specified in EP-101, TAB F", due to revision of EOP value (which forms basis for EAL value) resulting in "-43 inches" value being out of date. Reference to implementing procedure is made rather than updating the value since the value is anticipated to change with each fuel cycle and would necessitate frequent plan changes.	10 CFR 50, App. E.IV.B & C, require that EALs be based on in plant instrumentation (along with other considerations).  10 CFR 50.47,b.(4) also requires EALs based on facility system parameters. This EAL, as described in the revised plan, continues to be based on the plant system indication of RPV water level. The selected value for the EAL, as specified in the implementing procedure, continues to be based on the EOP value for the selected parameter. Since the bases for the EAL in the plan and its implementing procedure are unchanged from those reviewed during NRC approval of the EAL, the requirements of the above specified regulations continue to be met, and the effectiveness of the plan is maintained.