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Nuclear
Operations

April 3, 1986
VP-86-0021

Director of Nuclear Reactor Regulation
Ms. Elinor G. Adensam, Director
Project Directorate No. 3
Division of BWR Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Ms. Adensam:

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

Subject: Request for Amendment to Fermi 2
Technical Specification 3.6.1.7

In accordance with 10CFR50.91 and 10CFR50.92, Detroit Edison hereby requests an amendment to Fermi 2 Technical Specification 3.6.1.7, "Containment Systems - Drywell Average Air Temperature".

This specification requires that the drywell average air temperature not exceed 135 degrees Fahrenheit. The average drywell air temperature is defined via the volumetric average of temperatures measured in each of the six zones identified in Technical Specification 3/4.6.1.7. The subject Technical Specification clearly delineates the vertical and azimuthal locations of the temperature sensors to ensure that at least one temperature value from each of the six zones (i.e., elevations) is used in calculating the desired (volumetric) average drywell air temperature.

A review of Fermi 2 as-built documentation has indicated that the temperature sensor location information in the Technical Specification does not reflect exact agreement with the as-built data. The as-built locations are within a few inches of the Technical Specification values. Since the location information in the Technical Specification is provided for zone identification only,

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Detroit Edison considers the current information in the Technical Specifications to be acceptable approximations of the actual location data. Edison requests that Technical Specification 3/4.6.1.7 be revised as shown in the enclosure. This revision will add a note clarifying that the thermocouple locations defined in the specification are for reference only. This revision does not alter the requirement to determine the volumetric average temperature using at least one temperature reading from each zone.

Significant Hazards Analysis

Detroit Edison has evaluated the proposed change for significant hazards considerations in accordance with 10CFR50.92. Detroit Edison has determined that adding the clarification to Technical Specification 4.6.1.7 would not increase the probability or consequences of an accident evaluated in our FSAR. Instead, addition of this clarification would be expected to reduce the probability of untimely forced shutdown of the plant, and the attendant risk of plant transients.

Addition of this note would not create the possibility of a new or different kind of accident from any previously analyzed. The proposed change is administrative in nature.

Addition of the clarification would not involve a significant reduction in a margin of safety. The volumetric average temperature will be determined as before. However, the risk of untimely plant shutdown would be reduced by this clarification, increasing the margin of safety at Fermi 2.

Detroit Edison concludes that addition of this clarification to Technical Specification 3.6.1.7 involves no significant hazards considerations. This conclusion is consistent with example (i) of an amendment considered not likely to involve significant hazards considerations, shown in 48FR14870 (a purely administrative change to Technical Specification).

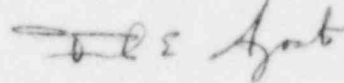
Detroit Edison has evaluated this request in accordance with the criteria in 10CFR170.21 and has enclosed an application fee of one hundred fifty dollars (\$150.00) as initial payment for this application for amendment under Facility Category A (Power Reactors).

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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. R. L. Woolley (313) 586-4211.

Sincerely,



cc: Mr. M. D. Lynch
Resident Inspector's Office
Supervisor, Advance Planning and Review Section
Michigan Public Service Commission
USNRC Document Control Desk
Washington, D.C. 20555

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I, FRANK E. AGOSTI, 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.

Frank E. Agosti

FRANK E. AGOSTI
Vice President
Nuclear Operations

On this 3rd day of April, 1986, before me personally appeared Frank E. Agosti, being first duly sworn and says that he executed the foregoing as his free act and deed.

*My commission
expires 12-14-86*

Lucina B. White

Notary Public