

October 26, 1998

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CONVERSION TO
IMPROVED STANDARD TECHNICAL SPECIFICATIONS FOR FERMI 2
(TAC NO. MA1465)

Dear Mr. Gipson:

On April 3, 1998, the Detroit Edison Company (DECo) submitted an amendment request to convert to the improved standard technical specifications for Fermi 2. By a letter dated September 28, 1998, DECo provided a supplement to the original submittal. The staff has reviewed Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.10, 4.0, and 5.0 of the proposed conversion. The staff does not have any questions related to Sections 1.0 and 2.0. However, additional information, as discussed in the enclosure, is requested for Sections 3.0, 3.1, 3.2, 3.10, 4.0, and 5.0 in order for the staff to complete its review.

The enclosed request was discussed with Mr. G. Ohlemacher of your staff on October 8 and 16, 1998. A mutually agreeable completion schedule of 45 days for your response was established. If circumstances result in the need to revise the schedule, please call me at the earliest opportunity.

If you should have any questions regarding this request, please contact me at 301-415-2828.

Sincerely,

ORIGINAL SIGNED BY

Andrew J. Kugler, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure: As stated

cc w/encl: See next page

DISTRIBUTION:

Docket File	PD3-1 RF
PUBLIC	BBurgess, RIII (BLB)
OGC	EAdensam (EGA1)
ACRS	JFoster
ACHu	TLiu
TTjader	JZwolinski

NRC FILE CENTER COPY

DOCUMENT NAME: G:\WPDOCS\FERMI\FE-STS02.RAI

To receive a copy of this document, indicate in the box "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PM:PD31	E	LA:PD31	E	D:PD31	E
NAME	AKugler:db <i>aka</i>		CJamerson <i>CJ</i>		CACarpenter <i>CA</i>	
DATE	10/23/98		10/23/98		10/25/98	

OFFICIAL RECORD COPY

9810300245 981026
PDR ADOCK 05000341
P PDR

DF01

Mr. Douglas R. Gipson
Detroit Edison Company

Fermi 2

cc:

John Flynn, Esquire
Senior Attorney
Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Drinking Water and Radiological
Protection Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr Blvd
P. O. Box 30630 CPH Mailroom
Lansing, Michigan 48909-8130

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
6450 W. Dixie Highway
Newport, Michigan 48166

Monroe County Emergency Management
Division
963 South Raisinville
Monroe, Michigan 48161

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Norman K. Peterson
Director, Nuclear Licensing
Detroit Edison Company
Fermi 2 - 280 TAC
6400 North Dixie Highway
Newport, Michigan 48166

August 1997

REQUEST FOR ADDITIONAL INFORMATION REGARDING
CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS
FOR FERMI 2 (TAC NO. MA1465)

General Note: Throughout this request for additional information (RAI), references to a standard technical specification (STS) mean the standard version of the TS published by the NRC in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1. References to an improved TS (ITS) mean the proposed converted TS submitted by the licensee.

All Sections

RAI 0.0-1: There is a generic issue involving a number of the Less Restrictive Administrative (LA) discussions of change (DOCs) in the Fermi submittal. In a number of cases the licensee essentially stated that items "can be relocated" to the Bases or the Technical Requirements Manual. But the DOCs didn't actually state that the information was relocated there. These DOCs should be revised to explicitly state the location to which the information is moved. The following table lists those LA DOCs that the staff identified with this problem:

ITS	LA DOC
3.1.2	LA.1
3.1.5	LA.1
3.2.2	LA.1
3.2.3	LA.1
5.4	LA.1
5.4	LA.3
5.5	LA.1
5.5	LA.3
5.5	LA.5
5.5	LA.8
5.5	LA.9

The licensee should also perform a general review of LA DOCs looking for this problem. Future RAIs will include a table similar to that above and refer back to this RAI.

In addition, in some cases LA DOCs are used where the requirement that is being "relocated" already exists in some other controlled document or program. The definition of the LA DOC should be revised and expanded to explain this type of case.

ENCLOSURE

Section 3.0

RAI 3.0-1: Insert 3.0-4 into the current technical specification (CTS) markup for CTS 3.0.4 contains wording that is different from the STS 3.0.4 markup (also referred to as the NUREG markup) and the proposed ITS 3.0.4. Resolve this difference.

Sections 3.1 and 3.2

RAI 3.1-1: STS surveillance requirements (SRs) 3.1.1.1 and 3.1.2.1 frequency states, in part, "... after criticality following fuel movement within the reactor pressure vessel or control rod replacement." The ITS versions of these SRs delete the words "or control rod replacement." The licensee indicated that control rod replacement always entails removing fuel and that the deleted words are unnecessary. Reference justification for difference (JFD) P.4 in STS 3.1.1 and JFD P.5 in STS 3.1.2. The licensee should submit a generic change request in relation to this change.

RAI 3.1-2: In the ITS Bases, references to NEDE-24011-P-A, "General Electric Standard Application For Reactor Fuel," (Reference 3 in ITS B3.1.1, Reference 1 in ITS B3.1.6, Reference 3 in ITS B3.2.3, and Reference 1 in ITS B3.10.7) delete the specific date at the end and replace it with "(latest approved version)." However, a TS reference must include the specific date of an approved version of the reference and cannot automatically change with the latest update to it. To allow automatic reference updates could involve unauthorized and unacceptable changes to the TS. Therefore, wherever the STS Bases includes a specific revision or revision date, the ITS should use a similar format.

RAI 3.1-3: STS 3.1.3, 3.1.6, and 3.10.8 refer to the banked position withdrawal sequence (BPWS) In ITS 3.1.3, 3.1.6, and 3.10.7, BPWS is replaced with the more general phrase "prescribed withdrawal sequence." The Bases for ITS 3.1.6 provide an adequate explanation of the term "prescribed withdrawal sequence." However, the Bases for ITS 3.1.3 and 3.10.7 do not adequately define this term. These Bases should be revised to more clearly define what is meant by "prescribed withdrawal sequence."

RAI 3.1-4: The new scram time methodology presented in STS 3.1.4 has been adopted. However, DOC M.3 does not discuss the applicability of the new methodology to Fermi 2. The DOC should be revised.

RAI 3.1-5: The SR 3.1.4.1 frequency has been changed from " \geq 120 days" in the STS, to ">120 days" in the ITS, with a reference to JFD P.1. However, P.1 says "Not Used." Provide the appropriate justification.

RAI 3.1-6: STS SR 3.1.8.2, the quarterly cycling of the scram discharge volume vent and drain valves, has not been incorporated into the ITS. Explain the justification for not adopting this SR including, if appropriate, other programs that already require testing these valves (e.g., inservice testing).

RAI 3.2-1: See RAI 3.1-2.

Section 3.10

RAI 3.10-1: The STS 3.10.4 Bases change (JFD P.7) in the section for the limiting condition for operation (LCO) appears to be a generic change. Prepare and submit a generic change request or explain why a generic change request is not appropriate.

RAI 3.10-2: ITS 3.10.6 does not include the following from the STS:

1. LCO condition c, requiring fuel assemblies to be loaded in compliance with an approved sequence,
2. Required Action A.2, to suspend loading fuel, and
3. SR 3.10.6.3, to verify that fuel assemblies are being loaded in compliance with an approved sequence.

These requirements exist to limit reactivity additions. Provide additional justification for not including these or similar requirements in the ITS.

RAI 3.10-3: See RAI 3.1-3.

RAI 3.10-4: See RAI 3.1-2.

Section 4.0

RAI 4.0-1: CTS 5.6 does not include any requirements related to the storage of fuel in the new fuel storage racks. The CTS markup does not indicate the addition of new requirements related to the new fuel storage racks. However, the STS 4.3.1 markup indicates that STS 4.3.1.2 for fuel storage in the new fuel storage racks will be incorporated. ITS 4.3.1 does not include these requirements. Determine whether the new requirements will be added and make the appropriate changes to the submittal.

Section 5.0

RAI 5.0-1: DOC A.3 to CTS 6.2.2.c (ITS 5.2) ends by indicating that references to health physics is revised to radiation protection. There is no specific reference to where those changes are made (i.e., CTS 6.2.1.c and 6.8.6). For clarity, specific references should be added.

RAI 5.0-2: The "Safety Function Determination Program" (STS 5.5.12, ITS 5.5.11) is added to the Programs and Manuals section of the TS in the conversion. The staff considers this change to be an addition and DOC A.9 refers to it as a new program. On this basis, it does not appear that the use of an A-type DOC (administrative) is appropriate. The addition of a program appears to be more restrictive. Revise the DOC to address this.

RAI 5.0-3: DOC LR.1 to CTS 6.5.1.5.c and d discusses the removal of reporting requirements from the TS. However, the last sentence in this DOC uses the term relocation. Resolve this inconsistency.

RAI 5.0-4: DOC LR.1 to CTS 6.5.1.5.c and d states, in part:

These reports involve no regulatory authority or approval.

This statement is not exactly correct in the sense that 10 CFR 50.73(a) provides requirements for the licensee to submit a licensee event report (LER) for fuel cladding failures that exceed expected values. The LER would provide the same information that is required by CTS 6.5.1.5.c. Because there is already a regulatory provision in place, the reporting requirements are not needed in the ITS. Revise the submittal to reflect the regulatory supporting documentation as mentioned above.