B. Ralph Sylvia
Senior Vice President

Detroit Edison

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Newport, Michigan 48166
(313) 586-4150

October 7, 1988
NRC-88-0224

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) Detroit Edison Letter to NRC, "Response to Notice of Violation," NRC-88-0033, dated April 4, 1988

Subject: Proposed Technical Specification Change (License Amendment) - Emergency Core Cooling System Actuation Instrumentation (3/4.3.3)

Pursuant to 10CFR50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed change into the Plant Technical Specifications. The proposed change deletes the requirement to perform response time testing of the High Drywell Pressure actuation of the High Pressure Coolant Injection (HPCI) System. The change will eliminate unnecessary operation of the HPCI system and thus enhance overall HPCI system reliability.

Detroit Edison has evaluated the proposed Technical Specifications against the criteria of 10CFR50.92 and determined that no significant hazards consideration is involved. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specifications and concurs with the enclosed determinations.

Pursuant to 10CFR170.12(c) enclosed with this amendment request is a check for one hundred fifty dollars ($150.00). In accordance with 10CFR50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

A001 1/1 w/check $150 # 641197

If you have any questions, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,

B Ralph Sylvia

Enclosure

cc: Mr. A. B. Davis
Mr. R. C. Knop
Mr. T. R. Quay
Mr. W. G. Rogers
Supervisor, Advanced Planning and Review Section,
Michigan Public Service Commission

I, B. RALPH SYLVIA, 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.

B. Ralph Sylvia

B. RALPH SYLVIA
Senior Vice President

On this 5th day of October, 1988, before me personally appeared B. Ralph Sylvia, being first duly sworn and says that he executed the foregoing as his free act and deed.

Shirley L Carlson

Notary Public
SHIRLEY L. CARLSON
Notary Public, Wayne County, MI
My Commission Expires Jan. 28, 1991

BACKGROUND/DISCUSSION

The NRC, in Inspection Report 50-341/87044, described a deficiency in the Fermi 2 surveillance program in that surveillance procedures for response time testing of the High Pressure Coolant Injection (HPCI) System did not adequately test the High Drywell Pressure actuation response time. This deficiency was reported by Detroit Edison in LER 87-048 and is the subject of violation 87044-03 in the above mentioned Inspection Report.

Detroit Edison subsequently modified the appropriate procedures and completed the necessary testing. Upon further review, it was determined that testing both the High Drywell Pressure and the Low Reactor Water Level actuation channels every 18 months would lead to undesirable multiple starts of the HPCI system in order to complete the necessary testing. Detroit Edison also found the response time testing of the High Drywell Actuation of HPCI to be unnecessary and thus, in Reference 2, committed to submitting the required Technical Specification change by October 31, 1988. This change request meets this commitment.

The Fermi 2 Emergency Core Cooling System (ECCS) analysis does not take credit for the High Drywell Pressure actuation of HPCI; the system initiation is assumed to be caused by the Low Reactor Water Level actuation signal. Across the spectrum of analyzed line break sizes the High Drywell Pressure signal has been found to precede the Low Reactor Water Level signal. Therefore, a response time surveillance of the HPCI system based upon the water level actuation provides a conservative verification that the system capability meets the plant design bases.

Based upon the above reasoning, Detroit Edison proposes to delete the response time surveillance requirement for the High Drywell Pressure channel of the HPCI system by making the appropriate change to Technical Specification Table 3.3.3-3. Functional testing of the High Drywell Pressure HPCI actuation channel and calibration of the associated instrumentation will remain Technical Specification requirements. The proposed page change is attached.

SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10CFR50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards considerations. To make this determination, Detroit Edison must establish that operation in accordance with the proposed amendment would 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 a margin of safety.

The proposed change to delete the surveillance requirement for response time testing of the High Drywell Pressure actuation of the HPCI system does not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The Fermi 2 ECCS analysis takes no credit for the High Drywell Pressure actuation of the HPCI system and the High Drywell Pressure signal has been found to precede the Low Reactor Water Level signal for all break sizes. Thus, the time response capability of the HPCI system can be conservatively verified by testing the system time response to only the Low Reactor Water Level actuation signal. The change reduces the number of HPCI system starts required for surveillance testing and thus increases the overall reliability of the HPCI system. This increased reliability acts to decrease the probability or consequences of previously evaluated accidents.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The change does not modify plant design or operation and therefore creates no new accident modes.

3) Involve a significant reduction in a margin of safety. As discussed in 1) above, the change acts to increase overall reliability of the HPCI system. As such, the change acts to increase the margin of safety.

Based on the above reasoning, Detroit Edison has determined that the proposed amendment does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT

Detroit Edison has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed Technical Specifications do meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

CONCLUSION

Based on the evaluations above: 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and 2) such activities will be conducted in compliance with the Commission's regulations and proposed amendments will not be inimical to the common defense and security or to the health and safety of the public.