

November 20, 1998

LICENSEE: Detroit Edison Company (DECo)

FACILITY: Fermi 2 Nuclear Plant

SUBJECT: MEETING WITH THE DETROIT EDISON COMPANY TO DISCUSS THE FERMII 2 IMPROVED STANDARD TECHNICAL SPECIFICATIONS CONVERSION

The NRC staff met with DECo at NRC Headquarters on November 9 and 10, 1998, to discuss issues related to the Fermi 2 submittal for the conversion to the improved standard technical specifications (STS). The primary focus of the meeting was to discuss proposed questions for a request for additional information (RAI) for Sections 3.4, 3.7, and 3.9 of the conversion. However, some more general issues were also discussed. Enclosure 1 is the list of questions that was faxed to the licensee prior to the meeting. Enclosure 2 lists the meeting participants.

In the course of the discussion concerning the questions, there were some cases in which the licensee was able to clarify the information in the submittal or point out additional information that existed in the submittal that satisfied the staff's concerns. In these cases, the questions will not be included in a formal RAI. The balance of the questions will be sent to the licensee in the near future in one or more letters requesting additional information.

Finally, the participants discussed general issues related to the staff's review, the status of RAIs, and the schedule for future meetings to discuss other sections of the conversion. The more significant items are provided in Enclosure 3.

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REQUEST FOR ADDITIONAL INFORMATION REGARDING
CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS,
SECTIONS 3.4, 3.7, AND 3.9 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. Refer to RAI 0.0-1 in the October 26, 1998, request for additional information. Additional DOCs affected by this issue are listed in the following table:

ITS	LA DOC
3.4.3	LA.2
3.4.6	LA.2
3.4.9	LA.2
3.7.2	LA.1
3.7.2	LA.4
3.7.3	LA.1
3.7.4	LA.2
3.7.5	LA.1
3.7.6	LA.1
3.7.6	LA.3
3.7.7	LA.2

Section 3.4

RAI 3.4-1: DOCs LR.1 for current TS (CTS) 3.4.3.2 (ITS 3.4.5), LR.2 for CTS 4.4.3.2.2.b (ITS 3.4.5), LR.1 for CTS 4.4.9.1.2 (ITS 3.4.8), and LR.1 for CTS 4.4.9.2.3 (ITS 3.4.9) discuss the change in the context of a relocation. However, LR DOCs are supposed to be used for the deletion of information that does not need to be relocated to a licensee-controlled program with regulatory program controls. If these DOCs are meant to be deletions, the use of the term

relocation is incorrect. If they are relocations, they should be LA DOCs and they should clearly state the program to which the information is relocated.

RAI 3.4-2: ITS 3.4.1 contains a number of deviations from the STS and the CTS. For example, the single loop actions are moved from an Action statement to the limiting condition for operation (LCO) and references to other LCOs that are in the CTS and the STS are removed. This specification will be forwarded to the technical staff for review as a beyond scope issue. The staff recognizes that the licensee plans to incorporate recent license amendments (Nos. 122 and 128) that affect this specification in the next revision to its submittal.

RAI 3.4-3: CTS 3.4.2.1 Action a (ITS 3.4.3) provides Action requirements for inoperable safety relief valve (SRV) position indicators and CTS SR 4.4.2.1.1 specifies surveillance requirements for SRV valve position indicators. These are not retained in ITS 3.4.3. DOC LA.2 justification states that the position indicators do not impact operability of the SRVs but does not provide an adequate discussion of the reason(s) why CTS 3.4.2.1 Action a and CTS SR 4.4.2.1.1 are no longer required in the ITS. For example, DOC LA.2 does not address why, in the CTS, these items were included in conjunction with a requirement to shut down the plant if one or more position indicators are inoperable.

RAI 3.4-4: CTS 3.4.3.2.c and CTS 3.4.3.2.e (ITS 3.4.4) specify limits on reactor coolant system (RCS) leakage "within any 24 hour period." ITS 3.4.4.c and ITS 3.4.4.d change the wording for this LCO to "within the previous 24 hour period" which is consistent with the STS. However, there is no DOC addressing this wording change. Provide discussion and justification for the equivalency of this wording change.

RAI 3.4-5: STS 3.4.4 Action B1 requires "Reduce LEAKAGE to within limit in 4 hours." ITS 3.4.3 Action B deletes this requirement per justification for difference (JFD) P.5. JFD P.5 states that when there is an acceptable compensatory action to take (in this case STS Required action B.2), the NUREG does not include actions that provide an explicit option to restore LCO compliance. This justification in JFD P.5 is in error because STS 3.4.4 Required Action B.1 does exist in the NUREG (STS) but is deleted from the ITS in the STS markup. This would be a generic change. Make ITS 3.4.4 Required Actions consistent with the STS.

RAI 3.4-6: CTS 4.4.3.2.1.a (ITS 3.4.4) requires that primary containment atmospheric gaseous radioactivity be monitored at least once per 4 hours. STS 3.4.4 requires monitoring of RCS unidentified and total leakage at least once every 8 hours. The ITS changes this frequency to at least once every 12 hours. There is inadequate justification in DOC L.1 for extending the frequency beyond both the CTS and STS values. In addition, ITS SR 3.4.4.1 includes a note providing an exception to SR 3.0.2 in Mode 1. There is no equivalent exception for the primary containment atmospheric gaseous radioactivity monitor in CTS 4.4.3.2.1.a. Change the ITS or provide a justification for this less restrictive requirement.

RAI 3.4-7: CTS 4.4.3.2.1.b & c (ITS 3.4.4) require that the primary containment sump flow rate and the drywell floor drain sump level be monitored at least once per 12 hours in Mode 1 and at least once per 4 hours in Modes 2 and 3. There is a footnote providing an exception to CTS 4.0.2 in Mode 1. In the ITS, monitoring is required at least once per 12 hours in Modes 1, 2,

and 3. There is no DOC that discusses the relaxation of the CTS Mode 2 and 3 monitoring frequency. Provide the appropriate justification for this less restrictive requirement.

RAI 3.4-8: The structure of the proposed ITS SR 3.4.5.1 is confusing. SR 3.4.5.1.a provides the requirements for testing pressure isolation valves (PIVs) other than the low pressure coolant injection (LPCI) injection isolation valves. This portion of the SR also specifies the pressure range for the test. Parts b. and c. of the SR provide the leakage limits for the LPCI injection isolation valves. However, no test pressure is specified. This SR should be restructured to clarify the required testing.

RAI 3.4-9: In STS 3.4.5, with the leakage of one or more RCS PIVs not within limit Action A specifies Required Action A.1, to isolate the affected line with one valve within 4 hours, as well as Required Action A.2, to isolate the affected line with a second valve within 72 hours. ITS 3.4.5 Condition A contains Required Action A.1 which is correctly derived from CTS 3.4.3.2 Action c, but STS 3.4.5 Required Action A.2 is deleted including the reference to it in the ITS 3.4.5 NOTE for Required Actions. The justification for this deletion is shown as JFD P.1 which is fundamentally a generic justification and does not specifically address this deletion. However, CTS 3.4.3.2 Action c requires isolating the line with "at least **one** other" valve (emphasis added). This appears to imply two valves. If so, there is an equivalent to STS Action A.2 in the CTS and the STS action should be retained.

RAI 3.4-10: The NOTE for STS 3.4.5 Required Actions contains the sentence "and be in the reactor coolant pressure boundary [or the high pressure portion of the system]." This sentence is deleted from the ITS 3.4.5 Required Action NOTE. The justification for this deletion is shown as JFD P.1 which is fundamentally a generic justification and does not specifically address this deletion. There is no justification for why the Note should not apply to Fermi. Retain one or the other of the phrases "and be in the reactor coolant pressure boundary [or the high pressure portion of the system]." In addition, the asterisk in CTS 3.4.3.2 Action c refers only to check valves. However, as written the ITS applies this note to all PIVs. There is no justification provided for this change.

RAI 3.4-11: CTS 3.4.3.2 Action d, CTS 4.4.3.2.3, and CTS Table 3.4.3.2-2 (ITS 3.4.5) contain actions, surveillance details, and a specific list of PIV leakage pressure monitors related to alarm-only functions. STS 3.4.5 and ITS 3.4.5 do not contain these requirements. DOC LR.1 justification states that the alarm functions do not relate directly to the operability of the RCS but does not provide an adequate discussion of the reason(s) why CTS 3.4.3.2 Action d, CTS 4.4.3.2.3, and CTS Table 3.4.3.2-2 are no longer required in the ITS. For example, DOC LR.1 does not address why, in the CTS, these items were included in conjunction with a requirement to shut down the plant if one or more PIV leakage pressure monitors are inoperable.

RAI 3.4-12: CTS 3.4.3.1.a requires the operability of the primary containment atmosphere gaseous radioactivity monitoring system channel (singular). ITS 3.4.6.b changes the wording of this requirement to one channel of primary containment atmosphere gaseous radioactivity monitoring system. ITS 3.4.6 and its bases do not indicate that this equipment has two channels, rather in most plants it has one channel as identified (gaseous) and the other channel is an "atmospheric particulate monitoring" channel. The reworded term "one channel of" in ITS 3.4.6.b can be misleading, giving rise to an error of using the atmospheric particulate

channel as the "one channel of". Consider rewording ITS 3.4.6.b consistent with CTS 3.4.3.1.a.

RAI 3.4-13: ITS 3.4.6, Condition C, is missing the word "inoperable" at the end of the sentence as shown in the STS 3.4.6, Condition C, markup. Correct the wording of ITS 3.4.6, Condition C.

RAI 3.4-14: CTS 3.4.3.1 Action (ITS 3.4.6) requires two leakage detection systems to remain Operable and allows a 30 day restoration time for any individual system inoperability. ITS 3.4.6 Action statements change this requirement to allow unlimited continued operation with either the primary containment atmosphere gaseous radioactivity monitor or drywell floor drain sump level monitoring system inoperable. STS 3.4.6 does not allow this less restrictive requirement and requires restoration within 30 days of any inoperable system even if only one system is inoperable. ITS 3.4.6 Action statements are a less restrictive change that is also a deviation from the STS. DOC L.1 provides explanation by stating that the primary system for identifying and quantifying unidentified leakage in the containment is the drywell floor drain sump flow monitoring system and thus restoration within 30 days of the other two systems is only required if both of them are inoperable at the same time. This change is not consistent with the STS and appears to be a less restrictive Required Action and presentation preference. Provide additional discussion and justification for the less restrictive change **and** a justification for deviation from the STS. This item is under separate review by the technical staff.

RAI 3.4-15: CTS Table 4.4.5-1 item 5 (ITS 3.4.7) requires Isotopic Analysis of an off-gas sample including Quantitative Measurements for at least Xe-133, Xe-135 and Kr-88 each 31 days. ITS 3.4.7 does not retain this requirement. DOC A.3 states that deletion of CTS Table 4.4.5-1 item 5 is acceptable because it is the same surveillance requirement as ITS SR 3.7.5.1 and therefore this deletion is an administrative change. This change does not appear to be administrative because ITS SR 3.7.5.1 requires verification that the gross radioactivity rate of noble gases is less than 340 mCi/second after decay of 30 minutes. These two surveillances do not appear to be the same or equivalent sample analyses. Clarify the justification.

RAI 3.4-16: CTS 3.4.5 Action c (ITS 3.4.7) requires sampling and analysis for Iodine per item 4.b of CTS Table 4.4.5-1 when in Operational Condition 1 or 2 following changes in Thermal Power or Off-gas level. ITS 3.4.7 eliminates this requirement. DOC A.2 states that the sampling requirements of CTS Table 4.4.5-1 item 4.a encompasses the requirements of item CTS Table 4.4.5-1 item 4.b and CTS 3.4.5 Action c, because it requires Iodine sampling each 4 hours when activity exceeds a limit. This justification seems to be in error because the basic Iodine sampling requirements, per ITS SR 3.4.7.1, is required only once per 7 days and then it is only required in MODE 1. There is no requirement within the 7-day interval, or during changing power levels, or increasing Off-gas levels, to determine if Iodine levels are increasing. The proactive CTS sampling requirement in response to transient precursors such as power changes and increasing Off-gas levels is thus eliminated without justification of why they are no longer needed. Provide additional discussion and justification for this less restrictive change.

RAI 3.4-17: CTS 3.4.5, Action c, Note* states "Not applicable during the startup test program." This note is deleted in ITS 3.4.7 with justification per DOC A.2. However, DOC A.2 doesn't

address this deletion. Provide discussion and justification for deleting CTS 3.4.5 Action c Note*.

RAI 3.4-18: DOC L.1 provides a lengthy justification for deleting CTS LCO 3.4.5.b (ITS 3.4.7) and its associated Actions and Surveillance Requirements. This involves the 100/E bar microcuries per gram limit and translates into deleting the sampling requirements of CTS Table 4.4.5-1 item 3 (Radiochemical for E bar determination). DOC L.1 does not address deleting CTS Table 4.4.5-1 item 1 (Gross Beta and Gamma Activity Determination) although the CTS markup shows DOC L.1 as the justification. While the change appears to be acceptable, provide the discussion and justification for deleting CTS Table 4.4.5-1 item 1.

RAI 3.4-19: CTS 3.4.9.2 Applicability (ITS 3.4.9) states "Operational Condition 4 when irradiated fuel is in the reactor vessel and the water level is less than 20 feet 6 inches above the top of the reactor pressure vessel flange". This requirement is eliminated from ITS 3.4.9 Applicability. DOC A.3 provides discussion and justification for deleting the water level requirement but it does not address deleting the phrase "when irradiated fuel is in the reactor pressure vessel". Provide additional discussion and justification for deleting the phrase "when irradiated fuel is in the reactor pressure vessel" from ITS 3.4.9 Applicability. This is a less restrictive change.

RAI 3.4-20: STS 3.4.10, RCS Pressure and Temperature (P/T) Limits, is written with the actual pressure/temperature limits being specified in the Pressure/Temperature Limits Report (PTLR). ITS 3.4.10 does not use the PTLR to specify limits but does not provide reference to the source that is used (e.g., Figure 3.4.10-1, etc.). Add the appropriate references.

RAI 3.4-21: CTS 3.4.1.4.a begins with the conditional phrase "When both loops have been idle" and CTS 3.4.1.4.b begins with the conditional phrase "When only one loop has been idle". These phrases are deleted in the CTS markup and are marked with DOC A.2 for justification. DOC A.2 provides discussion and justification for the combination of these CTS section requirements being equivalent to ITS SR 3.4.10.4 but does not address deleting these conditional phrases. Provide discussion and justification for deleting the CTS 3.4.1.4.a and CTS 3.4.1.4.b phrases "When both loops have been idle" and "When only one loop has been idle" from ITS SR 3.4.10.4.

RAI 3.4-22: CTS Figure 3.4.1.4-1 and reference to it, is contained within the CTS 3.4.1.4 markup under ITS specification ITS 3.4.10 and are deleted with DOC LR.1 shown as the justification. DOC LR.1 for ITS 3.4.10 addresses deleting this table with reference to ITS 3.4.1 "Scram" and "Exit" regions. Use of the terms "Scram" and "Exit" regions will be reviewed under ITS 3.4.1. However, the power to flow map (CTS Figure 3.4.1.4-1) should be retained.

RAI 3.4-23: CTS 3.4.6.1 Action (ITS 3.4.10) requires that when in MODES 1, 2, or 3, if any of the CTS 3.4.3.1 limits are exceeded, perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS and determine that the RCS acceptable for [continued] operation, but the CTS does not establish a specific completion time. ITS 3.4.10 Required action A.2 establishes 72 hours to determine that the RCS is acceptable for continued operation when in MODE 1, 2, or 3 and for other than MODE 1, 2, or 3, ITS 3.4.10 Required Action C.2 establishes, prior to entering MODE 2 or 3. These changes are justified

by the discussions in DOC A.5. These changes are more restrictive and not administrative. Provide the appropriate discussion and justification for this more restrictive change.

RAI 3.4-24: ITS 3.4.10 Required Actions A.2 and C.2 only require determining that the RCS is acceptable for [continued] operation. The CTS phrase "perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS" is deleted without discussion. This appears to be a less restrictive change. Provide the appropriate discussion and justification for this less restrictive change.

RAI 3.4-25: CTS 4.4.6.1.2 (ITS 3.4.10) specifies being to the right of CTS Figure 3.4.6.1-1 curve C which makes clear the safe area of the criticality limit curve. By implication the same applies (being to the right) to curve A and B although CTS 3.4.6.1 does not explicitly state to the right. ITS 3.4.10, as well as ITS Figure 3.4.10-1 (which is exactly the same as CTS figure 3.4.6.1-1), and ITS 3.4.10 Bases do not specify anywhere that the safe area relative to curve A, B, or C is to the right. ITS 3.4.10 simply requires maintaining pressure and temperature within limits. The clarification previously contained in the CTS is not carried forth in ITS 3.4.10. Provide clarification in ITS 3.4.10 of the safe area relative to ITS Figure 3.4.10-1 curves A, B, and C.

RAI 3.4-26: CTS 3.4.6.2 requires reactor steam dome pressure "less than" 1045 psig and CTS 3.4.6.2 Action applies with pressure "exceeding" 1045 psig. The CTS Action statement with pressure "equal to" 1045 psig is not specifically addressed in the CTS but CTS 4.4.6.2 surveillance also specifies pressure shall be verified to be "less than" 1045 psig. ITS 3.4.11 LCO and ITS SR 3.4.11.1 require reactor steam dome pressure "less than or equal to" 1045 psig. Adding "equal to" to ITS 3.4.11 LCO and ITS SR 3.4.11.1 is discussed within DOC A.2 as a resolution of a discontinuity within CTS 3.4.6.2 Action presentation. However, adding "equal to" in the ITS LCO and Surveillance is less restrictive and not administrative based upon the requirements of CTS 3.4.6.2 LCO and CTS 4.4.6.2. DOC A.2 does not state that the condition of being "equal to" 1045 psig is bounded by current analyses. Provide additional discussion and justification for adding "equal to" to ITS 3.4.11 LCO and ITS SR 3.4.11.1 as a less restrictive change.

Section 3.7

RAI 3.7-1: There appears to be an inconsistency in the Bases for ITS 3.7.1. The background section indicates that each residual heat removal service water (RHRSW) subsystem has a nominal flow capacity of 9000 gpm. The applicable safety analysis section indicates that the RHRSW flow assumed in the accident analyses is initially 9000 gpm. Finally, the [limiting condition for operation] LCO section indicates, in part, that an RHRSW subsystem is operable with flow greater than 8250 gpm. Explain or resolve this apparent inconsistency.

RAI 3.7-2: The STS markup and ITS Bases for TS 3.7.1, the bases for Action D.1 mentions the completion time for the residual heat removal system suppression pool spray function. However, in its conversion the licensee removed this function from the TS. This reference to the completion time should be removed.

RAI 3.7-3: ITS surveillance requirement (SR) 3.7.2.1 for the ultimate heat sink (UHS) verifies "the water level of each UHS reservoir, and the average water level of each of the two

reservoirs, ...". Are those the same thing or is the second requirement intended to measure the average level of the two together? If the latter is what is intended, it is unclear because of the use of the phrase "of each of the two...". From a UHS volume standpoint that latter interpretation is acceptable and consistent with the Bases statement that "If either reservoir does not meet the water level requirement, verification of the UHS combined volume is required." However, from the standpoint of the net positive suction head and pump vortexing discussed in the Bases, an average level is not an appropriate measurement (there is either acceptable actual level in each reservoir to prevent vortexing/loss of head or not). Clarify the what average measurement is to be made and the intent of using an average level measurement in the SR and the Bases.

RAI 3.7-4: In the background section of the ITS 3.7.2 Bases for the emergency equipment cooling water (EECW) system, in the second paragraph, it indicates that EECW initiates, among other things, on a loss-of-coolant accident (LOCA) signal. This is only partially correct. One of the EECW initiation signals is high drywell pressure, which is also a LOCA signal. However, there are other LOCA signals that do not initiate the EECW system, most notably low-low reactor vessel water level. This Bases statement should be clarified.

RAI 3.7-5: The Bases for ITS SR 3.7.3.2 state the SR verifies that the control room emergency filtration (CREF) system filter tests are performed in accordance with the Ventilation Filter Testing Program (VFTP) which is maintained in the Administrative Controls section of the ITS. The next sentence indicates that the CREF system filter tests are performed in accordance with Regulatory Guide (RG) 1.52 and/or the unit current licensing basis. The second sentence is extraneous and could cause confusion concerning the differences between the first and second sentences. The VFTP provides details concerning the filter tests that are performed. Remove or modify the second sentence.

RAI 3.7-6: CTS 3.7.2 includes CREF operability requirements for Modes 4 and 5. In either of these modes, required actions include suspending core alterations, handling of irradiated fuel in the secondary containment, and operations with a potential for draining the reactor vessel (OPDRVs). In ITS 3.7.3, the Applicability is revised by removing Modes 4 and 5 but making the LCO applicable during core alterations, handling of irradiated fuel in the secondary containment, and OPDRVs. The licensee presented this change as administrative (see DOC A.2). However, the staff views this as a less restrictive change. The DOC should be revised.

RAI 3.7-7: In CTS 3.11.2.7, if the gross activity is out of specification and cannot be brought back into specification, there are two alternatives provided; (1) be in at least STARTUP with all main steam lines isolated, or (2) secure the main condenser air ejectors (thereby exiting the applicability of the TS). In ITS 3.7.5 there are three alternatives; (1) isolate the main steam lines (which as explained in DOC A.2 is effectively the same as the first CTS option), (2) isolate the steam jet air ejectors (which is effectively the same as the second CTS option), or (3) leave the steam lines unisolated and the air ejectors in operation and proceed to Mode 3. There is no equivalent to this third option in the CTS. Therefore, this is a less restrictive change and the DOC should be revised to reflect this status.

Section 3.9

RAI 3.9-1: In the Bases for ITS 3.9.4, Bases insert B 3.9.4.-1 indicates that the insert is to clarify detail (see JFD P.6). This is a generic change because it is not in the CTS. A generic change request should be submitted.

RAI 3.9-2: In the Bases for ITS 3.9.5, the reference to LCO 3.1.2 is deleted. DOC P.4 indicates that LCO 3.1.2 does not contain requirements for control rods. However, the frequency for STS SR 3.1.2.1 is based, in part, on control rod replacement. In the ITS version, the licensee deleted the reference to control rod replacement based on the argument that it was a subset of another part of the stated frequency (i.e., fuel movement within the reactor vessel) since control rod replacement would always require fuel movement. Therefore, control rod replacement is a part of SR 3.1.2.1 and the reference to LCO 3.1.2 in the Bases of ITS 3.9.5 should be retained.

RAI 3.9-3: In the Bases for ITS 3.9.5, the change to the STS associated with JFD P.5 is a generic change and a generic change request should be submitted. In addition, as-changed the Bases refer to the control rods as a system. This reference is not correct and should be modified. Other specifications would be affected (e.g., STS 3.9.1, 3.9.2, 3.9.3 and 3.9.4).

RAI 3.9-4: It does not appear that all of the changes to the Applicable Safety Analysis section of the STS 3.9.6 Bases referenced to DOC P.4 are encompassed by that DOC. This applies in particular to references to 23 ft versus 20 ft 6 in. Clarify the justification for these changes, addressing in particular the relationship to the current licensing basis.

RAI 3.9-5: The Applicability statements for ITS 3.9.7 and 3.9.8 include a note describing an exception to the stated applicability. In the STS/ITS, exceptions are addressed directly in the Applicability statement. Relocate the information in the notes into the Applicability statements.

MEETING ATTENDEES

FOR NOVEMBER 9 AND 10, 1998, FERMI 2 MEETING ON THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS CONVERSION

NAME

AFFILIATION

Andrew Kugler	NRC/NRR/DRPW/PD31, Project Manager
Jack Foster*	NRC/NRR/ADPR/TSB, Conversion Lead Reviewer
Bob Tjader*	NRC/NRR/ADPR/TSB, Section 3.1/3.2 Lead Reviewer
Glenn Ohlemacher	Detroit Edison, Licensing
Charles Boyce	Excel Inc. (contractor to Detroit Edison)
Dan Williamson	Excel Inc. (contractor to Detroit Edison)

* Part-time participant

MISCELLANEOUS ITEMS DISCUSSED RELATED TO
THE FERMI-2 TECHNICAL SPECIFICATIONS
CONVERSION SUBMITTAL, NOVEMBER 9 AND 10, 1998

1. Future meetings will be scheduled for December 1, 2, and 3, 1998, and December 14 and 15, 1998, to discuss possible requests for additional information (RAIs) for Sections 3.3, 3.5, 3.6, and 3.8. The first meeting will be used to discuss Section 3.3. If time permits, Section 3.5 or 3.6 will be included in this meeting. The second meeting will be used to discuss the remaining sections.
2. Although the technical staff has not yet begun its review, the NRC Project Manager is concerned that the information provided in the submittal to support the removal of current technical specification (CTS) 3.6.2.2 for the suppression pool spray system is not sufficient. The staff asked the licensee to provide any references to previously docketed information that would support this change.
3. The staff and the licensee agreed that the licensee would contact the staff prior to submitting a response to current and future RAIs in order to ensure that the planned responses will address the staff's concerns.
4. The licensee plans to correct errors introduced in Revision 1 of the submittal when it submits Revision 2.
5. The licensee asked for and received clarification about the intent of RAIs 3.1-4 and 3.10-2 which were sent in a letter dated October 26, 1998.
6. The licensee briefly discussed two issues related to Section 3.3:
 - a. The CTS does not include requirements related to the emergency core cooling system minimum flow instrumentation. The improved standard TS (STS) do include this instrumentation and the licensee included it in the converted TS. However, in the course of preparing the procedures to perform the associated surveillance requirements (SRs), the licensee has realized that, because of the type of instrumentation used (Bartons), some of the SRs cannot be done. They are evaluating the issue right now. They could go back to the CTS (i.e., no requirements). But they are also considering a modified version of the STS appropriate to their instrumentation.
 - b. In STS 3.3.8.1, justification for difference (JFD) P.5 says the Fermi loss of offsite power logic design causes a problem with the definition of a channel. The JFD was basically written as a placeholder pending an additional submittal.

The licensee is working on resolutions to these two problems.