Douglas R. Gipson Senior Vice President, Nuclear Generation

Fermi 2 6400 North Dixie Hwy., Newport, Michigan 48166 Tel: 734.586.5201 Fax: 734.586.4172



March 30, 1999 NRC-99-0032

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington D C 20555-0001

References: 1) Fermi 2 NRC Docket No. 50-341 NRC License No. NPF-43

- Detroit Edison Letter to NRC, "Proposed Technical Specification Change (License Amendment) – Conversion to Improved Standard Technical Specifications," dated April 3, 1998
- NRC Letter to Detroit Edison "Request for Additional Information Regarding Conversion to Improved Standard Technical Specifications, Sections 3.4 and 3.9 for Fermi 2 (TAC No. MA1465)," dated December 4, 1998
- Subject: Transmittal of Revision 4 to Fermi 2 Improved <u>Transmittal Specification Submittal (TAC No. MA1465)</u>

Attached please find Revision 4 to the Fermi 2 Improved Technical Specification (ITS) Submittal (Reference 2). The purpose of this revision is to provide responses to the NRC Requests for Additional Information (RAI) concerning ITS sections 3.4 and 3.9 contained in Reference 3 and an update the ITS submittal to reflect these responses. In addition, other needed changes to the affected ITS sections are



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included. Attachment 1 contains a brief abstract of the changes included in this revision. Attachment 2 contains the responses to the Reference 3 RAI. Attachment 3 contains the revised pages for the submittal along with revision instructions.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,

Attachments

cc: A. J. Kugler A. Vegel NRC Resident Office Regional Administrator, Region III Supervisor, Electric Operators, Michigan Public Service Commission USNRC NRC-99-0032 Page 3

I, DOUGLAS R. GIPSON, 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.

DOUGLAS R<sup>#</sup> GIPSON Senior Vice President, Nuclear Generation

On this  $30^{th}$  day of <u>March</u>, 1999 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.

Revalie armette

Notary Public

ROSALIE A. ARMETTA NOTARY PUBLIC - MONROE COUNTY, MI MY COMMISSION EXPIRES 10/11/99

## ATTACHMENT 1 TO NRC-99-0032

# ABSTRACT OF REVISION 4 TO THE FERMI 2 IMPROVED TECHNICAL SPECIFICATION SUBMITTAL

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## Abstract of Revision 4 to the Fermi 2 Improved Technical Specification Submittal

Revision 4 to the Fermi 2 Improved Technical Specification (ITS) submittal incorporates the responses to Requests for Additional Information (RAI) contained in Attachment 2 that affect ITS Sections 3.4, Reactor Coolant System and 3.9, Refueling Operations. Revision bars are provided to aid in identification of the changed material. For those changes associated with an RAI, the RAI number, as used in Reference 3, is included with the revision bar.

Minor corrections are included in this revision. These changes are primarily non-technical, format, spelling, labeling, and editorial enhancements. The revision bars for these changes are marked with a circled "A." These changes are as follows:

- The LCO statement for LCO 3.4.1 is reformatted for clarity. The previous draft was difficult to read. Additionally, that draft inappropriately appeared to associate the resetting of the RPS APRM setpoint with the prohibition on operating in the "Scram" or "Exit" Regions. The reformatting clarifies the stability limitation applies at all times.
- The CTS Figure for Stability Regions is relocated. Previous revisions stated the details were in both the TRM and the Bases. This has been corrected to reference only the Bases (which contains all the relocated material).
- ITS Bases for SR 3.4.3.2 revises the appropriate bypass valve opening (from 10% to 20%) for "adequate stear, flow" to test SRVs.
- CTS markup of page 3/4 4-12 for ITS 3.4.5, contained an incorrect cross reference (SR 3.4.5.1.<u>c</u>), which is changed to SR 3.4.5.1.<u>b</u>.
- ITS 3.4.6 DOC L.1 has a sentence revised for clarity. Previous wording was fragmented and confusing.
- ITS SR 3.4.6.2 Bases is modified to delete a sentence that incorrectly describes verification of alarm setpoint and string accuracy. A revised JFD P.2 is also provided discussing the change.
- ITS 3.4.10 DOC A.3 is revised to correct the spelling of "action."
- ITS 3.9.4 DOC L.1 (and NSHC) incorrectly stated "no more than one" instead of "all but one".
- ITS 3.9.8 DOC LA.3 corrects a reference from "3.4.9" to "3.9.8".

In addition, changes are made to more closely incorporate the provisions of generic change TSTF-222, that received NRC approval after the original Fermi 2 ITS submittal. The revision bars for these changes are marked with a circled "B."

## ATTACHMENT 2 TO NRC-99-0032

DETROIT EDISON RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS, SECTIONS 3.4 AND 3.9 FOR FERMI 2 (TAC NO. MA1465) Attachment 2 to NRC-99-0032 Page 1 of 11

<u>General Note</u>: 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 licenvee. RAI numbers (e.g., RAI 3.4.5-1) refer to the numbers used in the November 9 and 10, 1996 meeting.

### 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

**Detroit Edison Response:** As requested, the affected discussions have been modified to more clearly indicate the ultimate location of the requirement being relocated.

### Section 3.4

#### Generic (ITS 3.4.5, 3.4.8, and 3.4.9:

**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. Revise these DOCs to clearly state the disposition of the affected information.

**Detroit Edison Response**: The referenced DOCs have been modified to clearly indicate that the requirements are being removed from the Technical Specifications and will not be controlled by a program with regulatory program controls.

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#### ITS 3.4.1

 RAI 3.4-2: Because of the many changes from the STS and the CTS, this specification is considered beyond scope and will be reviewed by the technical staff. No comments are provided.

## ITS 3.4.2

No comments

#### ITS 3.4.3

2. RAI 3.4-3: CTS 3.4.2.1 Action c provides Action requirements for inoperable safety relief valve (SRV) position indicators and CTS 4.4.2.1.1 specifies surveillance requirements for SRV valve position indicators. These are not contained in ITS 3.4.3. DOC LA.2 justification states that the position indicators do not impact Operability of the SRVs but CTS 3.4.2.1 Action c and CTS 4.4.2.1.1 had valid justification for their inclusion in the CTS such that COLD SHUTDOWN is required if one or more position indicators can not be restored to OPERABLE status within the given time frame. Possibly the reason for CTS 3.4.2.1 Action c, and CTS 4.4.2.1.1 Surveillance is to support CTS 3.4.2.1 Action b which has been eliminated from the ITS. The justification for deleting CTS 3.4.2.1 Action c and CTS 4.4.2.1.1 Surveillance from ITS 3.4.4 that counters the reason why SRV position indicator requirements were previously included in CTS 3.4.2.1, has not been addressed by DOC LA.2. Provide additional justification for removing SRV position indicator requirements from ITS 3.4.3 that counters the reason why they were included in the CTS and are no longer required in the ITS.

In addition, see RAI 0.0-1 for an issue related to DOC LA.2.

**Detroit Edison Response**: The SRV position indicator requirements were included in the Fermi 2 CTS (as well as other plants licensed in the same time frame) based upon their being included in the Standard Technical Specifications for BWR/4 plants in use at that time. The DOC provided for this change addresses why the requirement is no longer required to be retained in the ITS. Since there are no plant-specific reasons to retain this requirement, the DOC has been modified to indicate this.

#### ITS 3.4.4

 RAI 3.4-4: CTS 3.4.3.2.c and CTS 3.4.3.2.e 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 limiting condition for operation (LCO) to "within the previous 24 hour period" which is consistent with the STS. However, there is no DOC addressing this Attachment 2 to NRC-99-0032 Page 3 of 11

wording change. Provide discussion and justification for the equivalency of this wording change.

**Detroit Edison Response:** New DOC A.2 has been created to include justification for this wording change.

4. 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.

**Detroit Edison Response**: The JFD was intended to indicate that STS Action B1 should not have been included in the NUREG since it is in violation of the ITS Writer's Guide. Writer's Guide Section 4.1.6.g, page 43 of 51, discusses the elimination actions of this nature. As discussed in a meeting with the NRC, the change will be submitted to the BWR Owners' Group to be considered for a formal generic change to the NUREG.

 RAI 3.4-6 & 7: CTS 4.4.3.2.1.a requires monitoring the primary containment atmospheric gaseous radioactivity at least once per 4 hours. ITS surveillance requirement (SR) 3.4.4 requires verifying RCS leakage is within limits each 12 hours. This change to the frequency of monitoring for gaseous radioactivity is justified by DOC L.1. However, the 12 hours only applies to MODE 1. MODES 2 and 3 are 4 hours. Provide discussion and justification for the differences.

Detroit Edison Response: DOCs L.1 & L.2 have been revised to address these concerns.

#### ITS 3.4.5

6. RAI 3.4-8: ITS SR 3.4.5.1 specifies pressure isolation valve (PIV) leakage limits that are based on valve size. ITS SR 3.4.5.1 Insert 3.4.5-1 is added to it and provides exceptions by stating "for PIVs other than LPCI [low pressure coolant injection] loop A and B injection isolation valves." ITS 3.4.5.1 insert 3.4.5 corovides these exceptions with specific leakage limits for both the LPCI loop A and L injection isolation valves and the LPCI loop A and B inboard injection isolation testable check valves. Should ITS SR 3.4.5.1 insert 3.4.5 i

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**Detroit Edison Response**: SR 3.4.5.1 has been restructured to clarify the proposed requirements in a manner that addresses these concerns.

7. RAI 3.4-9 & 10: With one or more RCS PIVs not within limit, STS 3.4.5 Action A specifies Required Action A.1 as well as Required Action A.2. 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. In addition, 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 also deleted from the ITS 3.4.5 Required Action NOTE. The justification for these deletions is shown as JFD P.1 which is fundamentally a generic justification and does not specifically address these deletions. There is no justification for why the Note should not analy to you. Retain the one or the other of the phrases "and be in the reactor coolant coolant" are boundary [or the high pressure portion of the system]." Include an explanation of while "at least one other closed manual...." means in 3.4.3.2 ACTION c. Does this imply two valves. Also, the asterisk refers only to the "Check Valve." Is this the only valve in question here?

**Detroit Edison Response**: The CTS wording clarifies that the valve used for isolation purposes is different from the valve that is leaking beyond its limit. The CTS does not refer to two separate isolations. Note that the ITS wording was chosen to match these CTS words verbatim. Similarly, the Action A.1 Note has been revised to reflect the current licensing basis contained in the CTS. JFD P.1 has been modified to specifically address these differences from the NUREG.

- 8. See generic RAI 3.4-1 for an issue related to DOCs LR.1 and LR.2.
- 9. RAI 3.4-11: See RAI 3.4-1 for a generic issue related to LR DOCs. In addition, CTS 3.4.3.2 Action d, CTS 4.4.3.2.3, and CTS Table 3.4.3.2-2 contain actions, surveillance details, and a specific list of PIV leakage pressure monitors related to alarm-only functions. DOC LR.1 justification states that the alarm functions do not relate directly to the Operability requirements for the RCS but, CTS 3.4.3.2 Action d had valid justification for inclusion in the CTS such that COLD SHUTDOWN is required if one or more pressure interface valve leakage pressure monitors can not be restored to OPERABLE status within the given time frame. Should this requirement be retained in the Instrumentation Section? This question will be referred to the reviewer for Section 3.3.

Detroit Edison Response: None required.

## ITS 3.4 3

 RAI 3.4-12: CTS 3.4.3.1.a requires the Operability of the primary containment atmosphere gaseous radioactivity monitoring system channel. 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 and equal to CTS 3.4.3.1.a.

**Detroit Edison Response:** ITS 3.4.6.b has been revised to be consistent with CTS 3.4.3.1.a.

- 11. See generic RAI 0.0-1 for an issue related to DOC LA.2.
- 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.

Detroit Edison Response: Condition C has been corrected as requested.

13. RAI 3.4-14: CTS 3.4.3.1 Action 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 review by the technical staff as a beyond scope issue.

Detroit Edison Response: None required.

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#### ITS 3.4.7

14. RAI 3.4-15: CTS Table 4.4.5-1 item 5 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 milliCurios/second after decay of 30 minutes. These two surveillances do not appear to be the same or equivalent sample analyses. Clarify the justification.

**Detroit Edison Response**: The Bases for ITS SR 3.7.5.1 clarifies that SR 3.7.5.1 does require isotopic analysis for "at least Xe-133, Xe-135, and Kr-88." This is the same requirement as CTS item 5. This is also consistent with the ISTS Bases. To clarify this relation, CTS page 3/4 4-18 will be included in the markup for ITS 3.7.5, along with a new LA-DOC to address these details being relocated to the ITS Bases. These changes will be included in the scheduled update to ITS Section 3.7.

15. RAI 3.4-16: CTS 3.4.5 Action c requires sampling and analysis for lodine 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 lodine sampling each 4 hours when activity exceeds a limit. This justification seems to be in error because the basic lodine 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 lodine 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.

**Detroit Edison Response**: The change addressed by DOC A.2 is now being addressed as a Less Restrictive change in DOC L.4. However, in accordance with CTS 3.0.1, action c of CTS 3.4.5 is only required to be followed if LCO 3.4.5 is not being met. Thus there is no current requirement to determine lodine levels within the normal 7 day monitoring interval. For this reason CTS Table 4.4.5-1 items 4.b and 4.c are viewed to contain equivalent requirements. DOC L.4 addresses the change in this manner.

 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\* Attachment 2 to NRC-99-0032 Page 7 of 11

Detroit Edison Response: DOC A.2 has been revised to specifically include the footnote.

17. RAI 3.4-18: DOC L.1 provides a lengthy justification for deleting CTS LCO 3.4.5.b and its associated Actions and Surveillance Requirements. This involves the 100/E bar microcuries per g an 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.

**Detroit Edison Response**: DOC L.1 has been revised to address Item 1 as well as Item 3 of CTS Table 4.4.5-1.

#### ITS 3.4.8

18. See generic RAI 3.4-1 for an issue related to DOC LR.1.

#### ITS 3.4.9

19. RAI 3.4-19: CTS 3.4.9.2 Applicability 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". Provide additional discussion and justification for deleting the phrase "when irradiated fuel is in the reactor pressure vessel". This reactor pressure vessel for ITS 3.4.9 Applicability. This is a less restrictive change.

**Detroit Edison Response**: The definition of Operational Condition 4 contained in CTS Section 1.0 (as well as the definition of Mode in ITS Section 1.0) applies only with fuel in the vessel. DOC A.3 has been revised to explicitly address this administrative change to eliminate the duplication of this applicability within ITS 3.4.9.

- 20. See generic RAI 0.0-1 for an issue related to DOC LA.2.
- 21. See generic RAI 3.4-1 for an issue related to DOC LR.1.

## ITS 3.4.10

 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 Attachment 2 to NRC-99-0032 Page 8 of 11

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.

**Detroit Edison Response**: In accordance with the ITS Writer's Guide Section 4.1.4.b, page 40 of 51, "LCOs which require more than one parameter limit to be met will only refer to the parameters as required to be 'within limits." This case applies to ITS 3.4.10 which has several parameter limits contained in the associated SRs. Since SR 3.0.1 requires the SRs to be met in order to meet the associated LCO, a specific reference in the LCO to the limits is not necessary.

23. 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. In addition, ITS SR 3.4.10.4 is more restrictive than CTS 3.4.1.4.a because it applies at all times, not only when both loops have been idle. 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.

Detroit Edison Response: DOC A.2 has been revised to address these concerns.

24. 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 comment #1 for ITS 3.4.1. Although the justification contained in DOC LR.1 is reasonable, the power to flow map (CTS Figure 3.4.1.4-1) should be retained.

**Detroit Edison Response**: It is Detroit Edison's understanding that this issue will be reviewed in conjunction with the review of ITS 3.4.1 discussed in comment #1 above. However, it should be noted that CTS Figure 3.4.1.4-1 is now retained in the ITS Bases. This change was made in the incorporation of CTS amendment 128 into the ITS in ITS submittal revision 2.

25. RAI 3.4-23 and RAI 3.4-24: CTS 3.4.6.1 Action 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,

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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.

In addition, **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 appropriate discussion and justification (more/less restrictive) for CTS 3.4.6.1 Action requirements changing to ITS 3.4.10 Required Actions A.2 and C.2.

**Detroit Edison Response**: DOC A.5 has been replaced by DOC M.1 to address the addition of the time limits for the required actions as a more restrictive change as requested. In addition, DOC LA.2 has been added to address that the details of how effects of the out-of-limit condition on the structural integrity of the RCS is determined has been relocated to the ITS Bases.

26. RAI 3.4-25: CTS 4.4.6.1.2 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.

**Detroit Edison Response:** ITS SR 3.4.10.1 has been modified to clearly state that the acceptable region for operation is to the right of the curves in ITS Figure 3.4.10-1.

#### ITS 3.4.11

27. 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 analyzed within safety bounds as acceptable and CTS 3.4.6.2 LCO and CTS 4.4.6.2 imply otherwise. 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. Attachment 2 to NRC-99-0032 Page 10 of 11

**Detroit Edison Response**: DOC L. 1 has been included to address the condition of RCS pressure being exactly equal to 1045 psig.

### Section 3.9

#### ITS 3.9.4

 RAI 3.9-1: Bases insert B 3.9.4.-1 indicates that the insert is to clarify detail (see JFD P.6). The actual wording provides exception to the SR. This is a generic change because it is not in the CTS. Use the STS wording or obtain generic approval for the change.

**Detroit Edison Response**: A generic change will be submitted to the BWR Owners' Group for consideration,

#### ITS 3.9.5

RAI 3.9-2: In the Bases for ITS 3.9.5, the reference to LCO 3.1.2 is deleted. JFD P.4 indicates that LCO 3.1.2 does not contain requirements for control rods. However, SR 3.1.2.1 does reference frequency requirements following control rod replacement. Retain the reference.

**Detroit Edison Response**: The Bases have been changed to include the reference to LCO 3.1.2.

3. RAI 3.9-3: In JFD P.5, the licensee indicated that the changes to the Bases for ITS 3.9.5 are consistent with other ITS Bases. The BWR/6 has the same language. Further, the control rods are not a system. Specifications 3.9.1, 3.9.2, 3.9.3, and 3.9.4 refer to control rods. Any correction should be made consistently.

**Detroit Edison Response**: The reference to "system" is consistent with the GDC referenced (which requires two "systems"). The reference serves solely to make this connection and is not a reference to a plant defined "system". This item will be submitted to the BWR Owners' Group for consideration as a generic change.

#### ITS 3.9.6

4. RAI 3.9-4: Are all of the changes to the first paragraph of the Applicable Safety Analysis justified by P.4? In general, clarify which JFDs apply to which changes in this section (e.g., does JFD P.2 apply to all of the changes in the latter half of the first paragraph on STS Bases page B 3.9-20). Should the reference to 23 feet of water in this section be your licensing basis as opposed to the references to 20 feet 6 inches elsewhere?

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**Detroit Edison Response**: The licensing bases for spent fuel pool level at Fermi 2 is 20 feet 6 inches of water. An additional P.2 mark up has been added for Insert B3.9.6-1 to clarify this. The P.2 mark up is applied to changes associated with 20 feet 6 inches of water being the required level at Fermi 2. P.4 mark ups are applied to other differences that are associated with the Fermi 2 specific application of Regulatory Guide (RG) 1.25 (including those associated with the RG 1.25 references to 23 feet of water).

#### ITS 3.9.7

 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.

Detroit Edison Response: The Applicability has been modified to eliminate the use of a note.

#### ITS 3.9.8

6. See RAI 3.9-5.

# ATTACHMENT 3 TO NRC-99-0032

# INSERT AND REMOVAL SHEETS