

December 23, 1997

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO THE FERMI-2
SUBMITTAL TO EXTEND EMERGENCY DIESEL GENERATOR ALLOWED
OUTAGE TIMES (TAC NO. M94171)

Dear Mr. Gipson:

On November 22, 1995, Detroit Edison submitted an amendment request to extend the allowed outage times for the emergency diesel generators for NRC staff review. Detroit Edison provided supplemental information related to the amendment request in letters dated February 19 and June 12, 1996, and January 30, 1997. Detroit Edison also provided supplemental information related to the amendment request in letters dated April 19, May 3, and December 4, 1996, and August 7, 1997, responding to NRC requests for additional information.

Additional information, as discussed in the enclosure, is requested in order for the staff to complete its review. NRC requests that Detroit Edison respond within 30 days.

If you have any questions concerning 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

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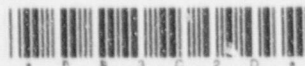
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Mr. Douglas R. Gipson
Detroit Edison Company

Fermi 2

cc:

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REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO
THE FERMI-2 SUBMITTAL TO EXTEND EMERGENCY DIESEL GENERATOR
ALLOWED OUTAGE TIMES (TAC NO. M94171)

The staff requests that Detroit Edison submit a proposed change to the administrative controls section of the technical specifications (TS) that adds a description of the licensee's configuration risk management program (CRMP). The submittal should also include a discussion that provides supporting information for the proposed change.

As discussed during a telephone conversation between the NRC and Detroit Edison on December 1, 1997, one of the elements required to support risk-informed TS allowed outage time (AOT) extensions is the implementation of a CRMP. The NRC has determined that a brief description of the CRMP must be added to the administrative controls section of the TS. For further information see SECY-97-095, "Probabilistic Risk Assessment Implementation Plan Pilot Application for Risk-Informed Technical Specifications," dated April 30, 1997. The third paragraph on page 3 of the SECY paper reads, in part,

In approving the proposed TS changes, *the staff is relying on a commitment made by the licensee, as described in the attached safety evaluation, specifically, with respect to utilization of a risk-informed configuration control technique to assess the risk associated with removal of equipment from service during the proposed AOT.* Because this is a new commitment specific to risk-informed TS changes, *the staff will ensure that the commitment is incorporated into the ANO-2 operating license.* This may be done *by incorporating the commitment as a license condition or in the administrative controls section of the TS.* (Emphasis added)

As the pilot program proceeded, the staff determined that the use of the administrative controls section of the TS provided a better option.

On September 26, 1997, the Combustion Engineering Owners Group (CEOG) provided comments on various draft regulatory guides and Standard Review Plan sections related to risk-informed regulation. Included in its comments on Draft Regulatory Guide DG-1065, "An Approach for Plant Specific, Risk Informed, Decisionmaking: Technical Specifications," CEOG provided proposed text for the description of the CRMP in the administrative section of the TS. This text was carefully crafted by CEOG in cooperation with the NRC staff to meet the intent of the staff's commitment to the Commission.

ENCLOSURE