

January 14, 1999

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, SECTION 3.3, 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 letter dated September 28, 1998, DECo provided a supplement to the original submittal. The staff has reviewed Section 3.3 of the proposed conversion. Additional information, as discussed in Enclosure 1, is requested in order for the staff to complete its review. Enclosure 2 provides information concerning the resolution of some of the questions discussed during the meeting.

The enclosed request was discussed with Mr. G. Ohlemacher of your staff on December 1 through 3, 1998. A mutually agreeable completion schedule of 60 days for your initial response to the technical issues was established. This response will also provide a schedule for the submittal of the final response, including the revised technical specification pages. 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

Enclosures: As stated

cc w/encl: See next page

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Fermi 2

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REQUEST FOR ADDITIONAL INFORMATION REGARDING
CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS,
SECTION 3.3 FOR FERMI 2 (TAC NO. MA1465)

General Notes:

1. 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.
2. For the more complex issues that were resolved after the December 1 through December 3 meeting, Enclosure 2 provides a discussion of the resolution.

General Comments

3.3-1 Generic LX-DOC

3.3.2.1: LA.2, LA.3, LB.1, LC.1; 3.3.3.1: LR.1, LR.2;

Comment: Clarify that the proposed current technical specification (CTS) limits described in these Discussions of Change (DOCs) can be changed without affecting safe operation of the plant. These L-DOC discussions do not provide sufficient supporting evaluation (e.g., contains unsubstantiated conclusions, vague statements i.e., "This change is acceptable because the Operability for is unchanged") for the staff to conclude that the proposed less restrictive generic changes do not present a significant safety question in the operation of the plant and that the TS requirements that remain are consistent with current licensing practices, operating experience and plant accident and transient analyses. Note that the CTS requirements associated with DOC LB.1 were deleted by Amendment No. 122 dated July 13, 1998. Revision 2 to the conversion submittal will reflect the changes associated with the amendment and the staff will review the revision. Therefore, this portion of this question is resolved.

Detroit Edison Response:

3.3-2 Generic LA.1 DOC

ITS: 3.3.1.1; 3.3.2.1; 3.3.2.2; 3.3.4.1; 3.3.5.1; 3.3.5.2; 3.3.6.1; 3.3.6.2;
3.3.6.3 (LA.2); 3.3.7.1; 3.3.8.1

Comment: The CTS proposes to move trip set point LCO requirements to the TRM. DOC LA.1 does not adequately discuss the CTS trip set point changes. Provide a revised DOC that evaluates the CTS requirements as operational limits and the CTS Allowable Values as TS operability limits. Explain how the ITS preserves the relationship between these limits and why it is sufficient to rely on the Allowable Values in determining trip channel operability for RPS instrumentation.

Detroit Edison Response:

3.3-3 Global R-DOC

Comment: R DOCs provide discussion and justification for relocating CTS requirements. The Selection Criteria is correctly applied to these relocated requirements. The Summary

ENCLOSURE 1

Disposition Matrix in the conversion submittal provides the name of the licensee document to which the CTS requirements are relocated but does not identify the regulation that will control future changes to the relocated requirements. Provide this information.

Detroit Edison Response:

3.3-4 Generic A-DOC

A.10: 3.3.1.1

A.3: 3.3.2.1, 3.3.4.1, 3.3.5.1, 3.3.5.2, 3.3.6.1, 3.3.6.2, 3.3.7.1, 3.3.8.1

Comment: CTS specified Actions for set points not within limits are eliminated as an administrative presentation preference only. These Actions state "declare the channel inoperable until the channel is restored to Operable status." ITS contain all the requirements and Actions for channels, including the set points and the usage rules of TS adequately dictate that channels be declared inoperable. Revise these A-DOCs to clarify which limits and set points are affected by the changes.

Detroit Edison Response:

3.3-5 Generic A-DOC

A.11: 3.3.1.1

A.4: 3.3.5.1, 3.3.5.2, 3.3.8.1

A.5: 3.3.4.1, 3.3.6.1, 3.3.6.2

Comment: The CTS requirement to perform a "simulated automatic operation" of all channels is deleted in the ITS. The DOCs indicate this is acceptable because the deleted requirement is synonymous with the logic system functional test (LSFT) and/or channel functional test (CFI). Revise the DOC to explain how this justification relates to ITS requirements.

Detroit Edison Response:

3.3-6 Resolved during the December 1 through December 3 meeting.

ITS Limiting Condition For Operation (LCO) 3.3.1.1

3.3.1.1- 1 The associated CTS requirements were deleted by Amendment No. 122 dated July 13, 1998. Revision 2 to the conversion submittal will reflect the changes associated with the amendment and the staff will review the revision. Therefore, this question is resolved.

3.3.1.1- 2 DOC A.3

CTS 3.3.1, Actions a.2 and a.3, and footnotes * and **

Comment: This DOC equates TS Action requirements with "directions on options for compliance" and states that "detailed direction for these options" are not included in ITS 3.3.1.1; rather "optional Actions presented rely upon the guidance of LCO 3.0.2." **Comment:** This DOC provides an obscure discussion for an administrative change. It relates CTS requirements, taken out of context, to undocumented interpretations of ITS Section 3.0 generic requirements. Revise the DOC.

Detroit Edison Response:

3.3.1.1- 3 CTS Table 4.3.1.1-1, Note (f)

DOC A.8

ITS Surveillance Requirement (SR) 3.3.1.1.3

Comment: The local power range monitor calibration frequency is changed to a megaWatt-days per standard ton (MWD/ST) basis from an effective full power hours basis. Provide supporting calculations to prove the CTS test frequency is unchanged. In addition, the use of MWD/ST as opposed to the STS MWD/T is not justified. The staff recommends using the abbreviation in the STS and explaining the details in the Bases.

Detroit Edison Response:

3.3.1.1- 4 Resolved during the December 1 through December 3 meeting.

3.3.1.1- 5 Resolved during the December 1 through December 3 meeting.

3.3.1.1- 6 The associated CTS requirements were deleted by Amendment No. 122 dated July 13, 1998. Revision 2 to the conversion submittal will reflect the changes associated with the amendment and the staff will review the revision. Therefore, this question is resolved.

3.3.1.1- 7 CTS 3.3.1, Action a.1

DOC LA.3

ITS Condition C

Comment: LA.3 states: "CTS 3.3.1, Action a.1 addresses the necessary requirements for a loss of RPS scram capability (one trip system with more than one inoperable channel in any Functional Unit." ITS Condition C includes loss of trip capability in either one or both trip systems. The CTS uses two Actions (a.1 and b) to address the same set of inoperable conditions. Revise DOC LA.3 discussion to address loss of RPS functional capability changes included in all CTS Actions.

Detroit Edison Response:

3.3.1.1- 8 CTS 3.3.1 footnote **

DOC LA.4

Comment: Revise LA.4 to state that footnote ** is an instructional note not related to the operational limits specified in TS and therefore this detail can be moved to the Bases.

Detroit Edison Response:

3.3.1.1- 9 DOC LA.5

Comment: What is the safety basis justification for not requiring that the shorting links be removed if the shutdown margin requirements in TS are not met. What is the safety basis justification for not increasing the required number of operable average power range monitors (APRMs) to 4 per trip system from three per trip system and the number of operable intermediate range monitors (IRMs) to 6 per trip system from three per trip system if the shorting links are removed in Mode 5. This LA DOC needs to be restructured to specifically address the

safety basis for the change. A statement of the safety function of the shorting links is missing from the narrative. The focus of the DOC should prove that the TS requirements that remain in the proposed ITS are sufficient to ensure safe operation of the plant. The conclusion states that "relocation of shorting link removal requirements continues to provide adequate protection of the public....." Explain how "removed requirements" are able to continue to provide adequate protection of the public.

Detroit Edison Response:

3.3.1.1- 10 CTS Table 4.3.1-1, footnote (f)
DOC LA.7

Comment: Revise LA.7. Explain the safety basis for relocating the method for performing the TS required surveillance.

Detroit Edison Response:

3.3.1.1- 11 CTS 4.3.1.3
DOC LA.10
ITS SR 3.3.1.1.17

Comment: CTS 4.3.1.3 requires "each" reactor trip functional unit demonstrated within its Response Time limit (except Reactor Vessel Steam Dome Pressure - High and Reactor Vessel Low Water Level). Corresponding ITS SR 3.3.1.1.17 is required for all RPS functions except IRMs, APRM Neutron Flux - High Setdown, APRM-Inoperable, Drywell Pressure - High, Main Steam Line Radiation-High, Scram Discharge Volume Water Level - High, Reactor Mode Switch - Shutdown Position, and Manual Scram. LA.10 specifies relocating RPS Response Time testing requirements to plant procedures for those RPS trip Functions that have no specific acceptance criteria located in the Technical Requirements Manual (TRM). This DOC does not adequately justify the relocation of CTS requirements. It is not clear that testing requirements moved to plant procedures are not associated with Updated Final Safety Analysis Report (UFSAR) requirements, such as TRM requirements. The moved RPS testing requirements should be discussed separately, providing a technical basis for removal of each testing requirement from the ITS. Revise LA.10. See also RAIs 3.3.6.1-6 and 3.3.6.2-3. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.1.1- 12 Resolved after the December 1 through December 3 meeting. See Enclosure 2.

3.3.1.1- 13 CTS Actions (a) and (b)
DOC LC.1

Comment: The first part of the original question was resolved during the December 1 through December 3 meeting. The second part of the question remains: The first bullet in this DOC should be revised to state that CTS Action a.1 is for "one or more" channels inoperable. The second bullet in this DOC should note that the ITS allows a 12 hour repair allowed outage time (AOT) for "any" inoperable channel. Further, the bulleted discussion about ITS requirements

should explain that multiple condition entry usage rules apply in the ITS. Any CTS changes that result should be discussed.

Detroit Edison Response:

3.3.1.1- 14 Resolved after the December 1 through December 3 meeting. See Enclosure 2.

3.3.1.1- 15 Resolved during the December 1 through December 3 meeting.

3.3.1.1- 16 CTS Action 7
DOC L.3

Comment: This DOC states that the associated actions for the Mode Switch in Shutdown are deleted consistent with NUREG-1433. NUREG-1433 requires Reactor Mode Switch - Shutdown Position to be operable (LCO 3.3.2.1) when the mode switch is in the shutdown position. CTS Action 7 requires verification that insertable control rods are inserted. Action 7 becomes LCO 3.3.2.1, Required Action E.2 in the ISTS. Revise L.3 to be consistent with NUREG requirements. The response to this RAI should be consistent with the response to RAI 3.3.2.1-4.

Detroit Edison Response:

3.3.1.1- 17 DOC L.4

Comment: Revise DOC L.4 to add reference to footnote (i) to CTS Table 3.3.1-1 and to CTS Table 4.3.1.1-1 for footnote (j) for Functions 8.a and 8.b.

Detroit Edison Response:

3.3.1.1- 18 The associated CTS requirements were deleted by Amendment No. 122 dated July 13, 1998. Revision 2 to the conversion submittal will reflect the changes associated with the amendment and the staff will review the revision. Therefore, this question is resolved.

3.3.1.1- 19 Resolved during the December 1 through December 3 meeting.

3.3.1.1- 20 The associated CTS requirements were deleted by Amendment No. 122 dated July 13, 1998. Revision 2 to the conversion submittal will reflect the changes associated with the amendment and the staff will review the revision. Therefore, this question is resolved.

3.3.1.1- 21 Resolved during the December 1 through December 3 meeting. See Enclosure 2.

3.3.1.1- 22 Resolved during the December 1 through December 3 meeting. See Enclosure 2.

3.3.1.1-23 (New question developed after the December 1 through December 3 meeting.)

Beyond Scope
CTS Table 4.3.1.1-1, footnote (b)
DOC M.4
STS/ITS SR 3.3.1.1.6
Justification For Difference (JFD) P.5

Comment: The CTS require the licensee to verify overlap between the source range monitor (SRM) and IRM channels during reactor startups. The STS SR 3.3.1.1.6 requires this overlap testing with the frequency stated as "Prior to withdrawing SRMs from the fully inserted position." The frequency in ITS SR 3.3.1.1.6 is revised to read "Prior to fully withdrawing the SRMs from the core." The licensee considers this interpretation to be consistent with the CTS. However, all of the recent BWRs have adopted the STS version of the SR. There are no plant-specific reasons cited by the licensee for this deviation from the STS. The licensee should adopt the STS or provide plant-specific reasons for the deviation from the STS.

Detroit Edison Response:

ITS LCO 3.3.1.2

3.3.1.2-1 CTS 4.3.7.6.b.2, 4.3.7.6.a.2
ITS SR 3.3.1.2.6, SR 3.3.1.2.7
DOC L.3

Comment: The ITS proposes to modify these SRs with a note that allows entry into the applicable mode for up to 12 hours before the TS SR is required to be met. The CTS do not contain this allowance. The STS Bases justifies the allowance as necessary because of the inability to perform the surveillance while at higher power levels. The ITS proposed to delete the justification for the note. The justification for the 12 hour allowed outage time (AOT) based on the submittal which does not include supporting Bases statements that the AOT is necessary for Fermi 2. Either revise the ITS to delete the 12 hour AOT from SRs 3.3.1.2.6 and 3.3.1.2.7 or provide the appropriate bases.

Detroit Edison Response:

3.3.1.2-2 Resolved during the December 1 through December 3 meeting.

3.3.1.2-3 CTS
ITS
DOC L.5

Comment: Revise L.5 to make a safety basis statement that the new action will ensure minimum core reactivity given fuel is in the reactor.

Detroit Edison Response:

3.3.1.2-4 CTS
ITS
DOC L.6

Comment: Provide additional safety basis justification to explain why special detectors provide an equivalent level of monitoring. This justification should be consistent with the Bases for ITS Table 3.3.1.2-1, Note (c).

Detroit Edison Response:

3.3.1.2-5 CTS
ITS
DOC LR.1

Comment: LR.1 deletes details of SRM detector operation that are related to plant design. Revise the DOC to provide a safety basis for not controlling instructions for SRM detector operation in the TS.

Detroit Edison Response:

3.3.1.2-6 Resolved during the December 1 through December 3 meeting.

3.3.1.2-7 Resolved during the December 1 through December 3 meeting.

3.3.1.2-8 Resolved during the December 1 through December 3 meeting. See Enclosure 2.

ITS LCO 3.3.2.1

3.3.2.1-1 CTS 3.1.4.3, CTS Table 3.6-1, and CTS Table 4.3.6-1
ITS 3.3.2.1

Comment: CTS 3.1.4.3, CTS Table 3.6-1, and CTS Table 4.3.6-1 Rod Block Monitor Applicability is "OPERATIONAL CONDITION 1 when THERMAL POWER is greater than or equal to 30% RATED THERMAL POWER". The corresponding ITS 3.3.2.1 Applicability for the Rod Block Monitor is "THERMAL POWER greater than or equal to 30%". Adopting the STS would have resulted in an applicability statement that read "THERMAL POWER greater than or equal to 30% RTP". This difference in Applicability is not discussed or justified. Correct the ITS 3.3.2.1 Applicability or provide change documentation.

Detroit Edison Response:

3.3.2.1-2 CTS 3.1.4.1 ACTION (a)
ITS 3.3.2.1 Required Action C.2.1.2
DOC A.4

Comment: CTS 3.1.4.1 ACTION (a) states: The use of this provision during reactor startup prior to the first 12 control rods being fully withdrawn is restricted to one startup "per calendar year". The corresponding STS 3.3.2.1, Required Action C.2.1.2, also uses "per calendar year" for this presentation. ITS 3.3.2.1 Required Action C.2.1.2 changes this presentation to "in the previous

12 months". DOC A.4 discussed this change as being an editorial wording preference. This change is considered unnecessary but requires a generic change before implementation.

Detroit Edison Response:

3.3.2.1-3 CTS 4.1.4.1.d, 3.1.4.1 Action a.
ITS Action C.2.2, D.1, SR 3.3.2.1.7
DOC L.3, P.5

Comment: CTS require compliance with the "prescribed control rod pattern" by a second licensed operator or other technically qualified member of the unit technical staff when the Rod Worth Minimizer is inoperable. CTS surveillance 4.1.4.1.d establishes the prescribed control rod pattern as the "Banked Position Withdrawal sequence," also referred to as the BPWS. Fermi ITS, however, propose to deviate from the STS BPWS actions. The licensee proposed similar changes in ITS 3.1.3, 3.1.6, and 3.10.8. In RAI 3.1.3 (see the October 26, 1998, RAI) the staff requested the licensee to revise the Bases for ITS 3.1.3 and 3.10.8 to more clearly define what is meant by "prescribed withdrawal sequence." Similar action should be taken for the ITS 3.3.2.1 Bases.

Detroit Edison Response:

3.3.2.1-4 CTS 3.3.1, Action 7; Table 3.3.6-1, Action 63
DOC A.1, JFD P.1

Comment: The ITS justifications state that the actions for the Control Rod Block Instrumentation Mode Switch in Shutdown position are consistent with CTS. In adopting CTS, ITS deletes LCO 3.3.2.1 Action E.1 (Suspend control rod withdrawal) and E.2 (Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies) and replaces these actions with proposed Action E.1, "Initiate action to insert a control rod block." ITS Action E.1 is not acceptable as a plant specific replacement for NUREG-1433 Action E.1. However, CTS Table 3.3.1-1 (Reactor Mode Switch-Shutdown Position) Action 7 requirements are consistent with NUREG-1433 LCO 3.3.2.1 Condition E.2; CTS Action 7 requires verification that insertable control rods are inserted. Therefore the proposed deviation from NUREG-1433 Action E.1 TS is not acceptable. Revise L.3 to be consistent with NUREG requirements. The response to this RAI should be consistent with the response to RAI 3.3.1.1-16.

Detroit Edison Response:

3.3.2.1-5 ITS Bases references
DOC

Comment: ITS proposes to adopt topical reports included in the ISTS. Although not specifically discussed in the licensee's submittal, the staff accepts the application of topical report NEDO-21231 because this report is referenced in section 15.4.9.6 of the UFSAR, the analysis for the control rod drop accident. Similarly, the staff accepts application of NEDC-30851 and NEDC-30851, Suppl. 2 because application of these topical reports was reviewed and approved by the NRC under Amendment No. 75 to the Fermi TS. However, the application of topical reports GENE-770-06-01 and GENE-770-06-01 has not been properly justified. Provide

references of staff safety evaluations approving these topical reports topical reports for use at Fermi-2.

This issue affects ITS 3.3.2.1, 3.3.5.2, 3.3.6.3, and 3.3.7.1. Note that for ITS 3.3.5.2, the staff approved the application of NEDC-30936 to the reactor core isolation cooling (RCIC) system instrumentation in Amendment No. 75. However, reference to GENE-770-06-02 in the Bases is not appropriate without staff approval of the application of that topical report to Fermi.

For the remaining LCOs, the licensee has adopted extended AOTs or SR frequencies that are based on GENE-770-06-01. Either adopt the CTS AOTs and SR frequencies or justify the application of the topical report to Fermi 2. (See also RAIs 3.3.6.3-1, 3.3.7.1-1, and 3.3.7.1-6)

Detroit Edison Response:

3.3.2.1- 6 Resolved during the December 1 through December 3 meeting.

3.3.2.2-1 Resolved during the December 1 through December 3 meeting. See Enclosure 2.

3.3.2.2-2 Resolved during the December 1 through December 3 meeting. See Enclosure 2.

3.3.2.2-3 Resolved during the December 1 through December 3 meeting.

ITS LCO 3.3.3.1

3.3.3.1-1 ITS 3.3.3.1, Table 3.3.3.1-1
DOC R.1

Comment: Primary Containment Pressure is included in the Category 1 functions required by STS 3.3.3.1. This variable was not in the CTS. Why is this function deleted in the ITS Markup?

Detroit Edison Response:

3.3.3.1-2 ITS 3.3.3.1, Table 3.3.3.1-1
DOC L.2

Comment: CTS Table 4.3.7.5-1 requires MODE 3 Applicability for the Containment High Range Radiation Monitor and Primary Containment Isolation Valve Position. ITS 3.3.3.1 deletes the MODE 3 Applicability for these Functions. DOC L.2 states that the initial conditions for the DBAs that rely on these monitoring functions "typically" assume power operation. MODES 1 and 2 Applicability is consistent with the STS for PAMS Functions. However, "Typically assume power operation" is not adequate justification for the CTS change. Provide additional documentation for this change.

Detroit Edison Response:

3.3.3.1-3

Comment: ITS 3.3.3.1 Conditions A and B are marked up with a reference to DOC M.1. DOC M.1 is not included in the submittal. (Assumed editorial error only)

Detroit Edison Response:

3.3.3.1-4 Resolved during the December 1 through December 3 meeting.

3.3.3.1-5 L.1

Comment: Delete L.1a) discussion in DOC L.1. The NUREG is a staff technical position which cannot be referenced in an SER as a basis for proposed CTS changes. Consider adding discussion to the justification relating PAM instrumentation to criterion 4 and the extended AOT for channel repair.

Detroit Edison Response:

3.3.3.1-6 Resolved during the December 1 through December 3 meeting.

3.3.3.1-7 L.5

Comment: The parenthetical discussion in the first paragraph of DOC L.5 is confusing and not germane to the issue. Consider removing it. Also, for the safety basis, address the differences and/or equivalence between the CTS approach and the ITS approach.

Detroit Edison Response:

ITS LCO 3.3.3.2

3.3.3.2-1 Resolved during the December 1 through December 3 meeting.

3.3.3.2-2 Resolved during the December 1 through December 3 meeting.

ITS LCO 3.3.4.1

3.3.4.1-1 DOC A.4

Comment: CTS Action b requires placing inoperable channels in trip whereas ITS (Action A.2) precludes the allowance to trip the inoperable channels if those channels are inoperable as a result of inoperable RPT breaker(s). DOC A.4 states this change is a clarification that would be imposed by CTS actions. Provide CTS action(s) citations to document that ATWS-RPT channels made inoperable by an RPT breaker would not be required to be tripped. Explain the clarification.

Detroit Edison Response:

3.3.4.1-2 DOC L.1

Comment: DOC L.1 refers to CTS Actions b, c.1 and d. The CTS markup also shows that L.1 applies to action c.2. Provide CTS Action(s) citations and concomitant discussions to document the actual relaxation of TS requirements. Additionally, DOC L.1 states that the pressure and

level functions are arranged in a 1-out-of-2 twice trip logic for each ATWS function, whereas the Bases state the actuation logic is 2-out-of-2 for either function in a trip system. Explain this difference.

Detroit Edison Response:

3.3.4.1-3 DOC L.2

Comment: The proposed note to SR 3.3.4.1.5 is a change to the STS. This note duplicates allowances permitted under ITS SR 3.0.1 and represents a generic change. Revise the ITS to adopt ISTS SR 3.3.4.1.5 per NUREG-1433. Also, references to ITS SR 3.3.4.1.5 should be changed to SR 3.3.4.1.4.

Detroit Edison Response:

ITS LCO 3.3.5.1

3.3.5.1-1 Resolved during the December 1 through December 3 meeting.

3.3.5.1-2 DOC M.4

Comment: The CTS Table 3.3.3-2 Allowable Value for Core Spray System actuation on Reactor Steam Dome Pressure - Low, and the Allowable Value for the Low Pressure Injection Mode of RHR actuation on Reactor Steam Dome Pressure - Low is "greater than or equal to 441 psig. ITS Table 3.3.5.1-1 changes the Allowable Value for these Functions to "greater than or equal to 441 psig, and less than or equal to 480 psig.

The CTS Table 3.3.3-2 Allowable Value for ADS System actuation on Core Spray Pump Discharge Pressure - High is "greater than or equal to 125 psig, increasing", and the Allowable Value for ADS System actuation on RHR LPCI Mode Pump Discharge Pressure - High is "greater than or equal to 115 psig, increasing". ITS Table 3.3.5.1-1 changes the Allowable Values for these Functions by listing the Allowable Values with upper and lower limits. Provide source documentation for the set point Allowable Value change.

Detroit Edison Response:

3.3.5.1-3 DOC L.2

Comment: ITS Table 3.3.5.1-1 provides a 7-day AOT for inoperable pump minimum flow instrumentation: Core Spray Pump Discharge Flow - Low, Low Pressure Coolant Injection Discharge Flow - Low, and High Pressure Coolant Injection Pump Discharge Flow - Low ECCS. This discussion justifies the 7-day period for power and shutdown operations. The L-DOC lacks specific safety basis discussions for situations to which the 7-day period applies. Provide additional discussion. The ITS includes new TS Allowable Values for pump flow rates. Provide source documentation for the set point Allowable Values.

Detroit Edison Response:

3.3.5.1-4 Resolved after the December 1 through December 3 meeting. See Enclosure 2.

3.3.5.1- 5 LA.3

Comment: ECCS manual initiation functions are included in CTS. The ITS also requires these functions to preserve the overall redundancy and diversity included as part of the licensing basis of Fermi 2. Revise the ITS to include CTS manual initiation functions. The same situation exists in ITS 3.3.5.2 for RCIC (LA.3) and ITS 3.3.6.1 for primary containment isolation (PCI) instrumentation (LA.6). (See RAIs 3.3.5.2-1 and 3.3.6.1-7)

Detroit Edison Response:

3.3.5.1- 6 Resolved during the December 1 through December 3 meeting.

3.3.5.1- 7 A.11

Comment: Provide additional discussion to elaborate on "go, no, go." type of function. Discuss the safety basis for replacing the CTS Channel Functional Test in ITS with a logic system functional test.

Detroit Edison Response:

**3.3.5.1- 8 DOC A.8
 DOC L.4**

Comment: CTS Action 30.b is shown to become ITS Conditions B.1, C.1, B.2 and F.1. CTS Action 30.b applies to inoperable channels in both trip systems without specifying one or both channels of a trip system. The ITS requirements for one inoperable channel in both trip systems require tripping the channels within 24 hours (B.3) or 8 days (F.2) or restoring the inoperable channel in 24 hours (C.2). The ITS requirement for more than one inoperable channel in both trip system is to enter the appropriate actions for each channel (separate condition entry) and if a loss of function condition exists then as stated in DOC A.8 take the actions in B.1, B.2, C.1 and F.1. Provide a DOC for CTS changes that result from adopting ISTS Required Actions for one inoperable instrument channel in each trip system for Table 3.3.5.1 functions that specify Actions B, C and F. See also RAIs 3.3.5.1-9 and 3.3.5.1-10. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.5.1- 9 L.1, L.4

Comment: DOCs L.1 and L.4 address multiple changes to CTS 3.3.3, action c, Table 3.3.3-1, Actions 30 and Action 31 requirements. The change discussion is too general to establish a clear safety basis conclusion for each CTS change resulting from adopting ITS actions (i.e., the DOC does not explain what changed and why there is no safety impact). Provide a revised CTS markup to clearly show the translation of CTS actions into ITS actions. Ensure the DOCs justify each proposed change. In addition to the general comments, the following specific comments are provided:

- a. The first sentence in L.1 does not appear germane to the balance of the discussion.
- b. The second sentence in L.1 reads, in part, "could be interpreted to require". Clarify whether CTS does or does not require the action.

- c. The discussion of Modes 4 and 5 in L.4 could be interpreted to mean the whole DOC is focused on only those modes. This needs to be clarified.
- d. Based on discussions in the meeting, L.4 justification should include discussion of the low probability of events.

See also RAIs 3.3.5.1-8 and 3.3.5.1-10. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.5.1- 10 A.8

Comment: ITS markup shows that Condition F.1 is derived from CTS Action 30.b. This does not agree with statements in A.8 and the CTS markup does not show F.1 as included in the A.8 change. Revise DOC A.8 change discussion and include specific discussion of the CTS to ITS changes addressed by A.8 together with a safety basis conclusion. See also RAIs 3.3.5.1-8 and 3.3.5.1-9. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.5.1- 11 A.10

Comment: DOC A.10 addresses CTS 3.3.3-1 Action 30.a requirements for the ADS to declare the ECCS system inoperable. Action 30.b also applies to ADS action requirements to declare the ECCS inoperable. Action 30.b is not discussed. Revise A.10.

Detroit Edison Response:

3.3.5.1- 12 LA.2

Comment: CTS Table 3.3.3-1 Functions 1c, 2.c, 2.d, 4.d and 4.e state the Allowable Value limits as "decreasing." This does not represent a design detail that can be relocated. Provide a DOC for eliminating this TS limit.

Detroit Edison Response:

3.3.5.1- 13 LC.1

Comment: CTS Table 3.3.3-1 Footnote (a) provides a testing allowed outage time before channels are declared inoperable and TS actions are required. ITS allowances are less restrictive than CTS allowances for ADS Functions 4.h and 5.h. The licensee has indicated this change is based on topical report NEDC-30936-P-A. In particular, address why this relaxation is necessary for SRs that are performed on an 18-month (i.e., refueling outage) frequency. During a refueling outage the ADS function is not required to be operable.

Detroit Edison Response:

ITS LCO 3.3.5.2

3.3.5.2- 1 LA.3

Comment: See RAI 3.3.5.1-5.

3.3.5.2- 2

Comment: CTS Action 50 is shown to become ITS Conditions B, C and E. CTS Action 50.b applies to inoperable channels in both trip systems. The ITS requirements for one inoperable channel in both trip system requires tripping the channels within 24 hours (B.2) or declare the RCIC system inoperable (E.1). The ITS requirement for more than one inoperable channel in both trip system is to declare RCIC inoperable (B.1). Provide a DOC for TS changes that result from adopting ISTS Required Action B.2 for one inoperable Level 2 instrumentation channel in each trip system.

Detroit Edison Response:

3.3.5.2- 3 Resolved during the December 1 through December 3 meeting.

ITS LCO 3.3.6.1

3.3.6.1- 1 CTS markup 3.3.2
A.4
LC.1

Comment: Correct references to DOC A.4 for CTS 3.3.2 Action b. (but not Actions b.1 and b.2) and Action c. to reference DOC LC.1. The same comment applies for ITS 3.3.6.2. (See RAI 3.3.6.2-2)

Detroit Edison Response:

3.3.6.1- 2 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 3 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 4 Resolved after the December 1 through December 3 meeting. See Enclosure 2.

3.3.6.1-5 DOC LC.1

Comment: The technical comments on DOC LC.1 were resolved during the December 1 through December 3 meeting. However, the licensee needs to revise DOC LC.1 to replace reference to ITS Action C with Action B (two places). The same comment applies to ITS 3.3.6.2 DOC LC.1. (See also RAI 3.3.6.2-5)

Detroit Edison Response:

3.3.6.1- 6 LA.2

Comment: CTS 4.3.2.3 requires performance of a Response Time Test at least once per 18 months on "each" Primary Containment Isolation (PCI) Function. The requirement to perform

Response Time Testing on each PCI function is deleted in the ITS. DOC LA.2, states that the requirements are relocated to the TRM and justifies the relocation on the fact that there is no acceptance criteria for these requirements contained in the TRM. This DOC does not adequately justify the relocation of CTS requirements. A technical basis for the removal of CTS requirements to perform response time testing on "each" function to ITS requirements to perform response time testing on selected functions should be discussed in a revised LA.2 DOC. See also RAIs 3.3.1.1-11 and 3.3.6.2-3. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.6.1- 7 LA.6

Comment: See RAI 3.3.5.1-5.

3.3.6.1- 8 A.12

Comment: Retain the CTS presentation of minimum operable channels per trip system in the ITS for Functions 1.e and 1.g. Retain the CTS Table 3.3.2-1 footnote (c) in the TS or the Bases.

Detroit Edison Response:

3.3.6.1- 9 A.13

Comment: Correct the discrepancy in the STS and ITS between the Background (Insert B 3.3.6.1-5) and the Applicable Safety Analyses (STS Bases page 170) concerning the number of sensors for the reactor water cleanup area temperature high function.

Detroit Edison Response:

3.3.6.1- 10 A.14

Comment: CTS are changed to add two required channels for the SLCS instrument function. This is an additional requirement and is more restrictive than current TS. Resubmit A.14 as an M-DOC.

Detroit Edison Response:

3.3.6.1- 11 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 12 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 13 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 14 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 15 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 16 Licensee response to RAI 3.3.6.1-8 will resolve this comment.

3.3.6.1- 17 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 18 LR.1

Comment: CTS Table 3.3.2-1, footnote ** establishes applicability limits for condenser high pressure in Modes 2 and 3. The isolation function may be bypassed when the condenser pressure is above the trip set point during a reactor startup or shutdown. CTS Table 4.3.2.1-1, footnote ** establishes surveillance applicability limits for condenser high pressure in Modes 2 and 3. Footnote ** requires the SRs to be current unless the function is bypassed. DOC LR.1 discusses combining these allowance into one phrase as ITS Table 3.3.6.1-1 Note (a), but does not justify the equivalency of the two phrases. The proposed ITS footnote for the condenser high pressure isolation applicability, becomes, "When not bypassed under administrative control." Revise the ITS to adopt Table 3.3.2-1, footnote ** or the STS Table 3.3.6.1-1 Note (a) or provide a plant-specific justification for deviating from both the CTS and STS.

Detroit Edison Response:

3.3.6.1- 19 Resolved during the December 1 through December 3 meeting.

3.3.6.1- 20 JFD P.1

Comment: ITS Bases insert B 3.3.6.1-9 states that high pressure coolant injection (HPCI) and RCIC steam supply line pressure-low signals are combined with ECCS drywell pressure-high signals to isolate HPCI and RCIC turbine exhaust line vacuum breaker (ITS functions 3.c and 4.c). Provide supporting arguments to justification P.1 for not including drywell pressure-high (ISTS function 3.d and 4.d) in ITS Functions which isolate HPCI and RCIC.

Detroit Edison Response:

ITS LCO 3.3.6.2

3.3.6.2- 1 Resolved during the December 1 through December 3 meeting.

3.3.6.2- 2 CTS markup 3.3.2

A.4

LC.1

Comment: Correct references to DOC A.4 for CTS 3.3.2 Action b. (but not Actions b.1 and b.2) and Action c. to reference DOC LC.1. The same comment applies for ITS 3.3.6.1. (See RAI 3.3.6.1-1)

Detroit Edison Response:

3.3.6.2- 3 LA.2

Comment: 4.3.2.3 requires performance of a Response Time Test at least once per 18 months on "each" Primary Containment Isolation (PCI) Function. The requirement to perform Response Time Testing on each PCI function is deleted in the ITS. DOC LA.2, states that the requirements are relocated to the TRM and justifies the relocation on the fact that there is no acceptance criteria for these requirements contained in the TRM. This justification is not adequate for this Less Restrictive change from CTS requirements to perform response time

testing on "each" function to ITS requirements to perform response time testing on selected functions. See also RAIs 3.3.1.1-11 and 3.3.6.1-6. Combine the responses to these three RAIs if that appears appropriate.

Detroit Edison Response:

3.3.6.2- 4 Resolved after the December 1 through December 3 meeting. See Enclosure 2.

3.3.6.2- 5 DOC LC.1

Comment: The technical comments on DOC LC.1 were resolved during the December 1 through December 3 meeting. However, the licensee needs to revise DOC LC.1 to replace reference to ITS Action C with Action B (two places). The same comment applies to ITS 3.3.6.1 DOC LC.1. (See also RAI 3.3.6.1-5.)

Detroit Edison Response:

3.3.6.2- 6 L.2

DOC L.2 concludes that ITS Required Actions C.1.1 and C.2.1 implement CTS Table 3.3.2-1, Actions 24 and 27 to require Secondary Containment Integrity be established with standby gas treatment operating. L.2 states that ITS Required Actions C.1.2 and C.2.2 provide options to declare the associated secondary containment isolation valves inoperable and/or declare associated SGT subsystem inoperable. Further, L.2 concludes that these alternate Actions for the loss of secondary containment isolation function will ensure continued safe operation, consistent with the allowed actions for inoperabilities of the systems affected by the inoperable instrumentation. Therefore, this less restrictive change will have a negligible impact on safety.

Comment: ITS Actions provide three options to placing the plant in a safe condition if secondary containment isolation instrumentation cannot be restored to operable status or tripped. The options are to isolate secondary containment, or declare the secondary CIVs inoperable and start one SGT subsystem or declare SGT inoperable. Revise DOC L.2 to discuss the less restrictive ITS requirements that result from replacing the requirement to establish Secondary Containment Integrity with standby gas treatment operating to each of the requirements provided by ITS required actions C.1, C.2 and C.3. Additionally, L.2 needs to state why proposed ITS actions are safe, not simply provide a statement that ITS actions are safe.

Detroit Edison Response:

3.3.6.2- 7 Resolved during the December 1 through December 3 meeting.

ITS LCO 3.3.6.3

3.3.6.3- 1 JFD P.4,

Comment: This DOC justifies adopting the 92-day test frequency for performing ITS SR 3.3.6.3.2 which requires a CFT on the portion of the low-low set (LLS) instrument channel that is outside of containment. The justification is that GENE-770 provides the industry a "standard time." Presently there is no such required CTS test. In order to adopt GENE-770 test

frequencies, provide an analysis similar to that required to adopt GENE-770, otherwise adopt the standard CFT 31-day test frequency. (See also RAI 3.3.2.1-5)

Detroit Edison Response:

3.3.6.3- 2 JFD P.4

Comment: The LLS instrumentation Bases state that LLS valves actuate on a 2-out-of-2 channel logic on high pressure once the valves are armed. ITS Table 3.3.6.3-1 required channels for Function 1, Reactor Steam Dome Pressure - High says 1 per LLS valve. Correct this inconsistency.

Detroit Edison Response:

**3.3.6.3- 3 Beyond Scope
DOC M.1
ITS Condition B**

Comment: The M-DOC can be used to justify adding functions to the LLS Instrumentation LCO, but additional justification is needed for proposed ITS required actions B.1, the note to B.1 and B.2. The proposed ITS would allow operation indefinitely with 11 of 15 valves inoperable if at least the lowest SRV set point group is operable. CTS 3.4.2.2 requires the LLS function to be operable. It does not currently allow any portion of the LLS instrumentation to be inoperable without entry into an Action Statement. The proposed ITS are less restrictive and conform to neither the CTS nor the STS. Adopt either the CTS or the STS or provide a plant-specific justification for deviating from them.

Detroit Edison Response:

ITS LCO 3.3.7.1

**3.3.7.1- 1 DOC M.4
JFD P.4**

Comment: ITS Table 3.3.7.1-1 lists the requirements for the control room emergency filtration system (CREFS) instrumentation. Function 1 is Reactor Vessel Water Level- Low, Low Level 2, Function 2 is drywell pressure and Function 3 is Fuel Pool Ventilation Exhaust - Radiation High. The FSAR assumes these functions initiate CREFS, but they do not appear in the CTS. The ITS assigns the STS 24-hour repair AOT (Condition B) and 6-hour test AOT for each function and a 92-day test frequency for Functions 1 and 2. In the STS the 24-hour repair AOT, the 92-day surveillance test interval and the 6-hour test AOT are based on topical report GENE-770. The ITS justifications discussed in DOC M.4 and JFD P.4 do not establish a clear safety-basis for proposed CTS changes. M.4 is a general statement that the added functions do not impact safe operation of the plant. DOC P.4 states that GENE-770-01 is not adopted for Function 1 of CREFS. This P.4 statement implies that GENE-770 is adopted for Functions 2 and 3 since these functions share Condition B which allows a 24 hour restoration time. Provide justification for proposing a 24 hour repair AOT and 6-hour test AOT for Functions 1, 2 and 3. Provide justification for proposing a 92 day test frequency for Functions 1 and 2. (See also RAI 3.3.2.1-5)

Detroit Edison Response:

3.3.7.1- 2 Resolved during the December 1 through December 3 meeting.

3.3.7.1- 3 LR.1

Comment: CTS Table 3.3.7.1-1 Action 70.a for one inoperable makeup air radiation channel requires placing that channel in the downscale tripped condition. ITS 3.3.7.1 Actions do not include this requirement for Function 4 as discussed and justified by DOC LR.1. DOC LR.1 states this action is proposed to be administratively controlled by plant personnel. DOC LR.1 restates CTS actions, describes the system operation on high and downscale trips, then states that the "downscale" trip is not an assumed or credited function. Based on the information in this discussion, the downscale trip is a design feature of the system used by CTS for remedial actions thus, proposed changes to modify CTS requirements is not acceptable. Revise the ITS to adopt CTS or NUREG-1433.

Detroit Edison Response:

3.3.7.1- 4 L.1

Comment: Revise L.1 to make a clear safety basis argument for changing CTS Mode 5 requirements to the ITS applicability requirements that replace Mode 5. What is the safety analysis that supports the "expected potential releases" justification.

Detroit Edison Response:

3.3.7.1- 5 LA.1

Comment: Provide a unique LA.1 DOC for LCO 3.3.7.1 which discusses the proposed change to eliminate the alarm set point. The DOC discussion incorrectly addresses isolation instrumentation.

Detroit Edison Response:

3.3.7.1- 6 P.1, A.4

Comment: Changes to NUREG-1433 (STS) Conditions B.1, B.2, C.1 and C.2 required actions are generic and justifications for NUREG/CTS changes are not complete. The proposed ITS Bases adopt the basis statements provided for the STS Actions without adopting the STS Actions. The proposed ITS Action B.2 24-hour repair AOT is retained from the STS but the STS action to "trip the channel" is replaced with "restore the channel." The 6-hour repair AOT in proposed ITS Action C.2 is retained from the STS but the STS action to "trip the channel" is replaced with "restore the channel." The STS actions are based on the remaining redundancy and diversity of the instrumentation available to provide CREFS actuation. The STS repair AOTs are based on topical reports. The topical reports are referenced in the Bases without a DOC reference to a staff SE approving use of the topical reports for Fermi-2. Therefore, these preferences to changing the NUREG are not acceptable based on current documentation. (See also RAI 3.3.2.1-5)

Detroit Edison Response:

ITS LCO 3.3.8.1

3.3.8.1- 1 Resolved during the December 1 through December 3 meeting.

ITS LCO 3.3.8.2

3.3.8.2- 1 Resolved during the December 1 through December 3 meeting.

SELECTED ISSUES RELATED TO SECTION 3.3 OF THE FERMI 2
TECHNICAL SPECIFICATIONS CONVERSION THAT WERE RESOLVED
DURING OR AFTER THE DECEMBER 1 THROUGH DECEMBER 3, 1998 MEETING

General Note: Throughout this enclosure 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.

3.3.1.1- 12 Current TS (CTS) 4.3.1.3, Note *
Discussion of Change (DOC) LA.12
ITS Surveillance Requirement (SR) 3.3.1.1.17

Original Comment: The proposed CTS changes are not acceptable. The design sensor response time is the specified limit in CTS. This limit is based on staff review and acceptance of a topical report NEDO-32291 and must be retained in the note to SR 3.3.1.1.17. This precludes substituting other topical report acceptance criteria such as historical data for response time testing for manufacturers data. Revise SR 3.3.1.1.17 to include "design sensor response time."

Resolution: In the ITS, the portion of the CTS footnote related to design response time is relocated to the Bases. The staff has determined that the Bases provide adequate control of this parameter. Therefore, this question is resolved.

3.3.1.1- 14 CTS Table 4.3.1.1-1, footnote (b) [for intermediate range and average power range monitors]
DOC LR.3
ITS SR 3.3.1.1.6 & 3.3.1.1.7

Original Comment: Clarify why the DOC list of reasons for "regulatory control is not needed" is germane to providing a safety basis justification for eliminating 1/2 decade overlap operability acceptance criteria for nuclear instrumentation.

Resolution: In the meeting with the licensee, the question evolved to one of the use of the terminology "regulatory control is not needed" in the LR DOCs. The staff, with assistance from the Office of the General Counsel, has determined that the wording in these LR DOCs is acceptable.

3.3.1.1- 21 CTS Table 2.2.1-1
ITS Table 3.3.1.1-1

Original Comment: CTS Table 2.2.1-1 includes a trip set point of "Initiation of fast closure" for Function 10, Turbine Control Valve Fast Closure. No Allowable Value is indicated for the CTS Function. ITS Table 3.3.1.1-1 does not include an Allowable Value for the Turbine Control Valve Fast Closure Function. It is not clear why there is no Allowable Value for this reactor protection system (RPS) Function. STS Table 3.3.1.1-1 includes an allowable value for this Function [9] as a "low trip oil pressure". There is no discussion or justification for omitting the CTS trip set point, nor any discussion of why the Fermi design does not allow conformance with the STS

requirements. Provide discussion and justification for omitting the CTS trip set point and justification for the STS deviation.

Resolution: The plant-specific design differences at Fermi 2 that led to this deviation from the STS are explained in the Bases and in the Updated Final Safety Analysis Report.

3.3.1.1-22 STS SR 3.3.1.1.10

Original Comment: STS SR 3.3.1.1.10 requires calibration of certain RPS trip units every 92 days. ITS SR 3.3.1.1.10 changes the surveillance requirement to "verify the trip unit setpoint" every 92 days. This requirement originated in CTS Table 4.3.1.1-1 as footnote k, to verify trip unit set points as part of a channel functional test (CFT). It is assumed that the CTS CFT provides instructions for out-of-tolerance trip settings, however, ITS SR 3.3.1.1.10 only requires verification of trip set points as a stand-alone requirement. The STS SR 3.3.1.1.10 requirement to "calibrate" the trip units is a more correct translation of the CTS requirement. Provide additional discussion and justification for the STS deviation, or implement the STS presentation of the surveillance requirement. (RAIs 3.3.1.1-22, 3.3.5.1-1, 3.3.5.2-3, 3.3.6.1-3, 3.3.6.2-1, and 3.3.7.1-2 are related.)

Resolution: The CTS requirement to verify the trip unit set point was reviewed and approved by the NRC in Amendment No. 75. The licensee carried this requirement over into ITS. The Bases describe what the verification entails, including requirements to adjust the set point if it is outside the limits of the Allowable Value or the limits accounted for in the appropriate set point methodology. This is acceptable to the staff. This resolution applies to all six affected LCOs.

3.3.1.2-8 ITS SR 3.3.1.2.5 and SR 3.3.1.2.6
DOC A.2

Original Comment: A Note is added to ITS SR 3.3.1.2.5 and SR 3.3.1.2.6 which deletes signal-to-noise ratio determination when the source range monitor (SRM) count rate is greater than, or equal to, 3.0 cps. This change, classified as an administrative change (DOC A.2), actually results in a less restrictive requirement, and should be discussed and justified as a less restrictive change. CTS 4.3.7.6 (c) and CTS 4.9.2 (c) require verification that the SRM count rate is at least 3.0 cps with the detector fully inserted, and does not omit the requirement to verify the count rate under any condition. Therefore, the Note added to ITS SR 3.3.1.2.5 and SR 3.3.1.2.6 is less restrictive. Addition of this SR Note also results in a deviation from the STS which is not technically justified. Provide additional discussion and justification for the less restrictive CTS change and provide justification for the STS deviation based on specific system design.

Resolution: Upon further review the staff determined that the ITS is an accurate translation of the CTS requirements and is, therefore, acceptable.

3.3.2.2-1 CTS 3/4.3.9
ITS 3.3.2.2
DOC L1, L.3

Original Comment: ITS propose to adopt topical report GENE-770-06-01 (included in the STS) in LCO 3.3.2.1 for rod block instrumentation. GENE-770-06-01 also applies to feedwater main

turbine trip instrumentation (LCO 3.3.2.2). However, the ITS does not propose application of the topical to this LCO. Provide additional discussion for this selective use of topical report AOT and surveillance test interval extensions.

Resolution: The application of GENE-770-06-01 has not been approved for Fermi 2. Therefore, it would not be appropriate to apply this topical report to the feedwater main turbine trip instrumentation. This issue is addressed for the rod block instrumentation in 3.3.2.1-5.

3.3.2.2-2 CTS 3/4.3.9 Actions (b) and (c)
ITS 3.3.2.2
DOC L.3

Comment: The ITS LCO 3.3.2.2 is written for a three channel feedwater/main turbine trip plant design. Fermi-2 uses a 4 channel (one-out-two taken twice) actuation logic with a CTS AOT allowance of 7 days for one inoperable channel and a 72 hour AOT allowance for two inoperable channels. LCO 3.0.3 applies if more than two channels are inoperable. The ITS proposes to extend the CTS AOT to allow 7 days for a second inoperable channel as long as trip capability is preserved. This proposed change deviates from the CTS and STS. The justification provided in DOC L.3 is based on NUREG-1433 as a "standard" provisions for inoperabilities that result in the remaining Operable logic constituting a 2-out-of-2 trip." Revise L.3 to delete the reference to the NUREG as a pre-approved regulatory document for CTS changes and provide reliability and safety discussions to justify extending the repair time for the second inoperable channel to 7 days from 72 hours.

Resolution: During the December 1 through December 3, 1998, meeting, the staff concluded that the proposed ITS is acceptable. In the STS, loss of one channel places the logic in a two-out-of-two arrangement to trip. For Fermi, if one channel is inoperable in each of the trip systems then the logic is also placed in a two-out-of-two arrangement to trip. Therefore, it is appropriate to allow the 7-day AOT in this situation.

3.3.5.1-4 ITS Action A, B and C

Original Comment: CTS Action 30 applies to core spray, low pressure coolant injection and high pressure coolant injection instrument functions which detect plant conditions requiring emergency core cooling system (ECCS) actuation. Action 30 becomes Actions A, B and C in ITS. The Bases support the ITS 24-hour period to repair or trip inoperable channels as allowances that accommodates the Fermi 2 design for Functions 2.e, 2.f and 2.g which detect breaks and Function 2.d for loop select logic. The Bases references topical report NEDC-30936-P-A. Provide a NEDC-30936-P-A citation giving the staff approved 24-hour repair or trip times, as applicable, for ITS functions 2.d, 2.e, 2.f and 2.g.

Resolution: These functions were specifically addressed in the licensee submittal dated August 20, 1990, for the application of the various topical reports on instrument test frequencies and allowed outage times. The staff reviewed and approved this application in Amendment No. 75 to the Fermi 2 TS.

3.3.6.1-4 DOC LC.1

"first bullet" - CTS 3.3.2 Action b.1 requires compensatory action be completed in 6 hours with inoperable channel(s) in one trip system, when tripping that channel would cause an isolation, while Action b.2 requires compensatory action be completed in 12 hours or 24 hours with inoperable channel(s) in one trip system, when tripping that channel would not cause an isolation. ITS 3.3.6.1 Action A allows either 12 or 24 hours for one inoperable channel in one trip system regardless of the effect of tripping that channel.

LC.1 concludes that these increased allowed Completion Times and testing times are consistent with the allowed outage times and testing allowances reviewed and approved in NEDC-30851-P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common To RPS And ECCS Instrumentation," and are considered appropriate based on the remaining capability to trip, the diversity of the sensors available to provide the trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of an isolation. Since a loss of trip function continues to require immediate (1 hour) restoration (ITS Action C), this extension to 12 or 24 hours for inoperabilities that still retain trip capability will not adversely affect safety.

Original Comment: STS LCO 3.3.6.1 includes repair allowances based on adopting NEDC-30851-P-A. Confirm that use of NEDC-30851 is approved for Fermi 2 CTS and provide topical report NEDC-30851 citations to show that the topical report does not credit a 6-hour repair allowed outage time (AOT) for channels that when tripped would cause an isolation. Revise DOC LC.1 to replace reference to ITS Action B with Action C. (See also 3.3.6.2-4)

Resolution: Amendment No. 75 reviewed and approved the application of this topical report to Fermi. The text of the topical report and its tables indicate that the staff approved a 12-hour repair AOT for isolation instruments common to RPS or to both RPS and ECCS and a 24-hour repair AOT for isolation instruments common to ECCS. However, the model TSs included the 6-hour AOT for those cases in which tripping the channel would cause the isolation. In the STS, only the 12-hour and 24-hour AOTs discussed in the topical report are applied. In the ITS, the licensee conforms to the topical report. Therefore, the ITS version is acceptable. The issue of references to Action B versus Action C is addressed in 3.3.6.1-5 (3.3.6.2-5).

3.3.6.2-4 DOC LC.1

"first bullet" - CTS 3.3.2 Action b.1 requires compensatory action be completed in 6 hours with inoperable channel(s) in one trip system, when tripping that channel would cause an isolation, while Action b.2 requires compensatory action be completed in 12 or 24 hours with inoperable channel(s) in one trip system, when tripping that channel would not cause an isolation. ITS 3.3.6.1 Action A allows either 12 or 24 hours for one inoperable channel in one trip system regardless of the effect of tripping that channel.

LC.1 concludes that these increased allowed Completion Times and testing times are consistent with the allowed outage times and testing allowances reviewed and approved in NEDC-30851-P-A, Supplement 2, "Technical Specification Improvement Analyses for

BWR Isolation Instrumentation Common To RPS And ECCS Instrumentation," and are considered appropriate based on the remaining capability to trip, the diversity of the sensors available to provide the trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of an isolation. Since a loss of trip function continues to require immediate (1 hour) restoration (ITS Action C), this extension to 12 or 24 hours for inoperabilities that still retain trip capability will not adversely affect safety.

Original Comment: STS LCO 3.3.6.2 includes repair allowances based on adopting NEDC-30851-P-A. Confirm that use of NEDC-30851 is approved for Fermi 2 CTS and provide topical report NEDC-30851 citations to show that the topical report does not credit a 6-hour repair AOT for channels that when tripped would cause an isolation. (See also 3.3.6.1-4)

Resolution: See resolution for 3.3.6.1-4.