

Douglas R. Gipson  
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## Detroit Edison



10 CFR 50.92  
November 26, 1997  
NRC-97-0092

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

- References: 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
- 2) Detroit Edison Letter to the NRC,  
NRC-96-0085 dated September 25, 1996  
Proposed Technical Specification Change (License  
Amendment) - Periodic Testing Requirement for  
Thermal Overload Protective Devices

Subject: Proposed Technical Specification Change (License  
Amendment) - Periodic Testing Requirement for  
Thermal Overload Protective Devices

Detroit Edison previously proposed, in Reference 2, to amend Operating License NPF-43 for the Fermi 2 plant by modifying Technical Specification Surveillance Requirement 4.8.4.3. At that time two changes were proposed: first, to delete the requirement for the periodic surveillance testing of Thermal Overload (TOL) Devices; and second, to clarify the situational surveillance testing requirement. Detroit Edison believes that elimination of the periodic surveillance testing is justified because there is no adverse impact on nuclear safety and a significant cost savings would be realized. We are prepared to provide any additional information the staff requires to approve this request.

The proposed changes were the subject of subsequent discussions with the NRC staff. During these discussions, the staff indicated that the periodic surveillance testing portion of the proposed change must be retained. Therefore, if the change proposed by Reference 2 is not approved, revised copies of the proposed technical



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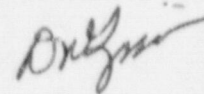
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specification pages are enclosed which reflect alternative wording for the surveillance which address only the clarification to the situational testing requirement. This alternative wording preserves the second part of the original change.

Detroit Edison previously evaluated the proposed Technical Specification change against the criteria of 10CFR50.92 in Reference 2 and determined that No Significant Hazards Consideration is involved. The revised alternative wording now proposed is encompassed by the text in Reference 2; therefore, the previous No Significant Hazards Consideration remains applicable. In accordance with 10CFR50.91(b)(1), Detroit Edison is providing a copy of this letter to the State of Michigan.

No commitments are made in this letter. If you have any questions, please contact Mr. Norman K. Peterson at (313) 586-4258.

Sincerely,



Attachments

cc: A. B. Beach  
G. A. Harris  
B. L. Burgess  
A. J. Kugler  
Supervisor, Electric Operators, Michigan  
Public Service Commission, J. R. Padgett

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. Gipson*

DOUGLAS R. GIPSON  
Senior Vice President

On this 26<sup>th</sup> day of November, 1997 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.

*Rosalie A. Armetta*

Notary Public

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