

LICENSEE: Detroit Edison Company (DECo)

February 10, 1999

FACILITY: Fermi 2 Nuclear Plant

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

The NRC staff met with DECo at NRC Headquarters on February 3 and 4, 1999, to discuss issues related to the Fermi 2 submittal for the conversion to the improved standard technical specifications. The primary focus of the meeting was to discuss the proposed questions for a request for additional information for Section 3.6 of the conversion. The proposed questions were faxed to the licensee prior to the meeting, as discussed in the January 26, 1999, meeting summary for the January 11 and 12, 1999, meeting. Enclosure 1 lists the meeting participants.

The staff was able to clarify some of its questions for Section 3.6 during the discussion, which will assist the licensee in preparing its responses. A few of the comments were resolved during the meeting. The staff and the licensee also discussed the timing for the licensee response and the staff review for this section. The questions for Section 3.6 will be sent to the licensee in the near future in a letter requesting additional information. Finally, the participants discussed the status of beyond-scope issues associated with the conversion and preparation of the tables that are used to document the various changes in the safety evaluation for the amendment. Enclosure 2 is the list of beyond-scope items that was discussed.

ORIGINAL SIGNED BY

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Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures: As stated

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MEETING ATTENDEES

FOR FEBRUARY 3 AND 4, 1999, FERMI 2 MEETING ON THE  
IMPROVED STANDARD TECHNICAL SPECIFICATIONS CONVERSION

<u>NAME</u>	<u>AFFILIATION</u>
Andrew Kugler	NRC/NRR/DRPW/PD31, Project Manager
Jack Foster*	NRC/NRR/ADPR/TSB, Conversion Lead Reviewer
Robert Giardina*	NRC/NRR/ADPR/TSB, Section 3.6 Lead Reviewer
Bob Tjader*	NRC/NRR/ADPR/TSB, Section 2.0/3.1/3.2/3.10 Lead Reviewer
Glenn Ohlemacher	Detroit Edison, Licensing
Charles Boyce	Excel Inc. (contractor to Detroit Edison)
Dan Williamson	Excel Inc. (contractor to Detroit Edison)

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\* Part-time participant



## FERMI 2 CONVERSION BEYOND-SCOPE ISSUES

February 4, 1999

### Definite Beyond-Scope Issues

1. **Item 3.3.6.3-1:** Improved technical specifications (ITS) 3.3.6.3, Condition B, is significantly different than the current TS (CTS) and the standard TS (STS). Discussion of Change (DOC) M.1 justifies adding specific functions to the TS. But there is no justification for the much less restrictive actions compared to the CTS. See request for additional information (RAI) 3.3.6.3-3. Response is expected 3/15/99. There is not a package for review by the tech staff yet. Based on a cursory review and discussion, the current proposal was clearly unacceptable.
2. **Item 3.4.1-1:** ITS 3.4.1, Justification For Difference (JFD) P.5, implementation of recommendations for avoiding thermal-hydraulic instabilities. This was identified as beyond scope in the licensee's original submittal. It is under review by SRXB (Uises). Waiting to see how it is incorporated in Rev. 2 of the submittal.
3. **Item 3.4.1-2:** ITS 3.4.1, DOCs LA.1 and A.2, JFD P.1, moving single recirc loop operation from an action statement to the limiting condition for operation, deleting a number of CTS-required actions. This was identified as a potential beyond scope by the staff during its review. **COMBINE WITH 3.4.1-1.**
4. **Item 3.4.6-1:** ITS 3.4.6, DOC L.1, deletion of STS bracketed action B.2 for reactor coolant system leakage detection systems. This was identified as beyond scope by the staff during its review. It was reviewed by SPLB (Ordaz). Safety evaluation (SE) signed 1/28/99 indicating the change is acceptable.
5. **Item 3.5.1-1:** ITS 3.5.1, JFD P.1, addition of actions for a situation in which both a low pressure coolant injection (LPCI) and a core spray subsystem are out of service. This was identified as beyond scope in the licensee's original submittal. It is under review by SRXB (Uises). No RAI questions expected. Discussed with the Technical Specifications Branch (TSB) 1/26/99. Gave precedent information (Duane Arnold, Brunswick) to Uises along with historical bases for the current Fermi TS. Estimated completion date (ECD) is 2/26/99.
6. **Item 3.5.1-2:** ITS 3.5.1, JFD P.5, relocation of emergency core cooling system instrumentation response time testing to 3.5.1. This was identified as beyond scope in the licensee's original submittal. It was reviewed by HICB (Garg). SE dated 1/13/99 indicating the change is acceptable.
7. **Item 3.6.1.3-1:** ITS 3.6.1.3, DOC A.3 (see also ITS 3.1.8), excepting the scram discharge volume vent and drain valves from the containment isolation valve TS on the basis that ITS 3.1.8 already provides adequate controls for these valves. This was identified as beyond scope by the staff during its review. It is under review by SCSB (Pulsipher). Question received 10/29. It will be sent with the 3.6 RAI (currently expected 2/10/99 with response by 3/15/99).

ENCLOSURE 2

8. **Item 3.6.1.3-2:** ITS 3.6.1.3, JFD P.5, modified actions for special case containment isolation valves. This was identified as beyond scope in the licensee's original submittal. It is under review by SCSB (Goel). Question will be sent with the 3.6 RAI (currently expected 2/10/99 with response by 3/15/99).
9. **Item 3.6.2.1-1:** ITS 3.6.2.1, JFD P.4, clarify actions for suppression pool temperature greater than 110°F. This was identified as beyond scope in the licensee's original submittal. It was under review by SCSB (Goel). Withdrawn from SCSB review on 2/2/99 because Bob Giardina has identified this as a generic change.
10. **Item 3.6.2.2-1:** CTS 3.6.2.2, R.10, remove drywell and suppression pool spray from the TS. This was identified as beyond scope by the staff during its review. It is under review by SCSB (Lobel). Held a call with the licensee to discuss questions from SCSB on 2/1/99. Questions will be sent with the 3.6 RAI (currently expected 2/10/99 with response by 3/15/99).
11. **Item 3.8.5-1:** ITS 3.8.5, JFD P.4, required DC systems with the reactor shutdown. The licensee's proposal is more restrictive than the CTS and less restrictive than the STS. This was identified as a beyond scope by the staff during its review. However, the resolution of this generic issue is under discussion between NRC and the industry. Based on discussions between the NRC and the industry, Tomlinson believes the licensee proposal will be acceptable. He plans to review it himself (i.e., EELB review not required).
12. **Items 3.10.4-1 and 3.10.5-1:** ITS 3.10.4, JFD P.7 and ITS 3.10.5, JFD P.5, clarify requirements for single control rod removal. This was identified as beyond scope in the licensee's original submittal. Under review in SRXB (Ulises). No RAI questions expected. ECD is 2/26/99.

Potential Issues (some may become beyond-scope issues)

1. ITS 3.3.1.1, JFD P.5, allowing source range monitors to be partially withdrawn when obtaining overlap with the intermediate range monitors. This was identified as a potential beyond scope by the project manager during his review. TSB 3.3 lead reviewer agreed. See **RAI 3.3.1.1-23**.
2. **RESOLVED:** ITS 3.4.5, JFD P.1, exception in surveillance requirement (SR) 3.4.5.1 from an allowable leakage rate based on valve size for LPCI injection isolation valves, per the CTS. This was identified as a potential beyond scope by the project manager during his review. TSB 3.4 lead reviewer does not consider this beyond scope. See **RAI 3.4-8**.
3. **RESOLVED:** ITS 3.6.1.3, JFD P.9, exclusion of penetrations with a seal system from STS SR 3.6.1.3.11. This was identified as a potential beyond scope by the project manager during his review. TSB 3.6 lead reviewer does not consider this beyond scope.
4. ITS 3.8.1, DOCs A.11 and LR.4, removing the CTS requirement to verify the combustion turbine-generator operable within 8 hours of declaring an emergency diesel generator inoperable, and every 8 hours thereafter. This was identified as a potential beyond scope by the staff during its review. The licensee will resolve in the response to **RAI 3.8.1-1**.



5. ITS 3.8.6, inclusion of new guidance on battery performance testing, as suggested by Dr. Saba. The licensee is considering whether such a change would be appropriate.
6. ITS 5.5.X, modifications to the configuration risk management program description. The program description is not in the current submittal but will be in Revision 2.
7. CTS 6.8.1.b refers to NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980. NRC STS 5.4.1.b adds reference to NUREG-0737, Supplement 1. In its conversion, the licensee chose not to add the reference to Supplement 1 to TS 5.4.1.b. The staff recommended adding this reference since the actions described in both the NUREG and its supplement are required. In the November 9 and 10, 1998, meeting, the licensee indicated it would revise the reference in Revision 2.
8. The staff identified some problems with the Revision 1 submittal. The licensee plans to resolve these items in Revision 2.

#### Review Branches

SRXB - Reactor Systems Branch  
SPLB - Plant Systems Branch  
TSB - Technical Specifications Branch  
HICB - Instrumentation and Controls Branch  
SCSB - Containment Systems and Severe Accident Branch