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July 31, 1986  
VP-86-0093

Director of Nuclear Reactor Regulation  
Ms. Elinor G. Adensam, Director  
Project Directorate No. 3  
Division of BWR Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Ms. Adensam:

- Reference: 1) Fermi 2  
NRC License No. NPF-43  
NRC Docket No. 50-341
- 2) Detroit Edison to NRC Letter, "Request for License Amendment to Modify License Conditions on Emergency Operating Procedures (EOPs) and Detailed Control Room Design Review", VP-86-0043, dated June 19, 1986

Subject: Submittal of Procedures Generation Package and Modified License Amendment Request

Reference 2 requested the Nuclear Regulatory Commission to amend the Fermi 2 Operating License (NPF-43) to modify the two license conditions which govern the submittal of the Procedures Generation Package (PGP) and the submittal of a summary report on the Detailed Control Room Design Review (DCRDR). These license conditions are identified as Items 3(a) and 1(a), respectively, on Attachment 2 to the license.

As noted in Reference 2, the basis for the license amendment request was: 1) the absence of an approved set of generic Revision 4 Emergency Procedure Guidelines (EPGs) prevented the development of plant specific technical guidelines for submittal as part of the PGP; and 2) the absence of approved generic EPGs prevented the conduct of the DCRDR. The subject Revision 4 EPGs are currently being developed by the BWR Owners Group, of which Detroit Edison is one of the approximately twenty-three members. The current schedule for submittal of the Revision 4 BWROG EPGs to the NRC is September, 1986.

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[This schedule constitutes a nine month slip from the December, 1985 submittal date which was targeted at the time of issuance of the Fermi 2 OL, and reflects a one month slip from the targeted submittal date discussed in our previous amendment request (i.e., Reference 2).]

Subsequent to the submittal of Reference 2, and as a result of conversations with NRC-NRR personnel, Detroit Edison committed to meet the PGP license condition via submittal of a PGP which contained the plant specific writer's guide, a description of the EOP validation/verification program, and a description of the EOP training program. Submittal of the plant specific technical guidelines (a portion of the PGP as defined in Supplement 1 of NUREG-0737) would be deferred until after the NRC had approved the BWROG's generic EPGs-Revision 4. [It should be noted that Fermi 2 plant specific technical guidelines (PSTG) have been developed using draft Revision 4AC of the generic EPGs. Subsequent to the availability of an approved set of generic Revision 4 EPGs, Edison will upgrade these PSTGs to reflect differences between the draft 4AC and approved Revision 4 EPGs.]

A subsequent review of Supplement 1 to NUREG-0737 indicated that for plants, like Fermi 2, that developed plant specific technical guidelines (PSTG) using generic technical guidelines only, a description of the planned method for developing plant specific EOPs from the generic guidelines, including plant specific information, was to be submitted as part of the PGP. Detroit Edison has since incorporated the PSTG summary document into the PGP documents listed above and is providing the resultant Fermi 2 PGP in Enclosure 2.

Therefore, the amendment request pertaining to Attachment 2, Item 3(a) of Operating License NPF-43 previously submitted via Reference 2 is replaced in total by this submittal. Detroit Edison is still requesting that the license amendment request applicable to Attachment 2, Item 1(a) of the license be granted. This amendment request has been modified pursuant to recent discussions with NRC-NRR personnel. The modified amendment request is provided in Enclosure 1.

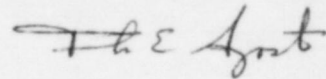
As indicated in a July 22, 1986 telecon, Detroit Edison will submit a document which identifies and justifies differences between the Fermi 2 PSTGs and the BWROG EPGs-Revision 4.

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This document will be submitted within three months after issuance of NRCs approval of Revision 4 to the BWROG EPGs. The requirements of 10CFR170.21 were met via the Reference 2 submittal. Detroit Edison has provided a copy of this letter to the State of Michigan in accordance with 10CFR50.91.

Please direct any questions to Mr. R. L. Woolley at (313) 586-4211.

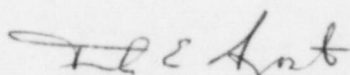
Sincerely,



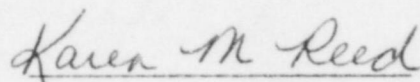
cc: Mr. M. D. Lynch  
Mr. W. G. Rogers  
Supervisor, Advance Planning and Review Section  
Michigan Public Service Commission  
USNRC Document Control Desk  
Washington, D. C.

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I, FRANK E. AGOSTI, 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.

  
FRANK E. AGOSTI  
Vice President  
Nuclear Operations

On this 31st day of July, 1986,  
before me personally appeared Frank E. Agosti, being  
first duly sworn and says that he executed the foregoing  
as his free act and deed.



Notary Public

KAREN M. REED  
Notary Public, Monroe County, Mich.  
... Commission Expires May 14, 1990

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bcc: F. E. Abramson  
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J. E. Conen  
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Approval Control  
Secretary's Office (2412 WCB)  
NRR Chron File

PROPOSED REVISION TO FERMI 2  
OPERATING LICENSE NPF-43, ATTACHMENT 2  
ITEM 1(a)

Enclosure 1 to  
VP-86-0093

## I. Introduction

Detroit Edison requested that the license conditions governing the submittal of the Fermi 2 Procedures Generation Package (PGP) and the conduct of a Detailed Control Room Design Review (DCRDR) be revised as presented in Reference 1. The following discussion modifies the Reference 1 request by withdrawing the PGP amendment proposal, and revising the DCRDR proposal.

As noted in the cover letter, subsequent to submittal of Reference 1, Detroit Edison determined that a Fermi 2 PGP which meets the requirements of NUREG 0737, Supplement 1 could be provided as required by Item 3(a) of Attachment 2 to the Operating License. Therefore, this license amendment request is withdrawn.

The following discussion provides a revised amendment request for Item 1(a) of Attachment 2 to the Operating License.

## II. Revised License Condition

Detroit Edison requests that Item 1(a) in Attachment 2 of Operating License NPF-43 be modified to read:

"DECo shall comply with the NRC staff requirements for the conduct of a detailed control room design review (DCRDR) contained in Supplement 1 to NUREG-0737. DECo shall submit a summary report of its DCRDR no later than eight months after issuance of NRC's approval of Revision 4 to the BWROG Emergency Procedures Guidelines."

The use of milestones, in lieu of calendar dates in the amended license condition, was discussed with the NRC in a July 2, 1986 telephone conversation. Due to the fact that Detroit Edison has no direct control over the BWROG's submittal schedule for Revision 4 of the EPGs, nor does Edison control the NRC's review schedule for the generic EPGs once they are submitted, it is unwarranted to use calendar dates in the license condition.

It should be noted that the proposed license condition above reflects the same timing for completion of the DCRDR as was required by the original license condition. That is, the original license condition required submittal of the DCRDR summary report by November 30, 1986.

This date was predicated on submittal of Revision 4 EPGs by the BWROG to the NRC in December, 1985, and the subsequent issuance of an NRC SER in March, 1986. Therefore, approximately eight months was allocated between issuance of the SER and submittal of the DCRDR summary report. The same timing is reflected in the modified license condition above.

### III. Bases for Revision

The need for the requested license amendment is predicated on the fact that the NRC has directed Detroit Edison to utilize approved EPGs in the DCRDR, and Revision 4 of the generic EPGs has not been submitted to the NRC for approval.

In Supplement 6 to the Fermi 2 Safety Evaluation Report (Section 22.2, Item I.D.I, paragraphs 3 and 4) the NRC states:

"Most importantly, we require the DCRDR to be performed based on approved Emergency Procedures Guidelines (EPGs) which in turn are related to a function analysis used to identify information and control needs. Moreover, a plant specific analysis must be performed to translate the EPGs into plant specific technical guidelines which will be then used, via a task analysis to develop the control and information needs applicable to the Fermi 2 facility. An approved set of EPGs will not be available until about fall 1985."

"A DCRDR performed at the Fermi 2 facility prior to the development of an approved set of EPGs would have to be repeated later, thereby significantly increasing the licensee's effort and our review with very little advantage since we have conducted a preliminary review of the Fermi 2 control room design which we found supported the issuance of a full power license."



The most recent set of BWROG EPGs approved by NRC is Revision 3. Revision 4 to the EPGs is currently being developed by the BWR Owners Group of which Detroit Edison is a member. Drafts of Revision 4 which Detroit Edison has reviewed show substantial improvement over Revision 3 EPGs. An NRC approved set of BWROG EPGs-Revision 4 is not available to allow completion of the Fermi 2 DCRDR on the schedule shown in the Operating License.

Detroit Edison has proceeded in good faith with the work described in the DCRDR Program Plan (submitted via Reference 2) using drafts of Revision 4 BWROG EPGs. For example, at Detroit Edison's request, General Electric has initiated development of plant-specific EPGs and the Task Analysis needed for the DCRDR. Similarly, the enclosed Procedures Generation Package (Enclosure 2) indicates that plant specific technical guidelines (PSTGs) have been developed using draft Revision 4AC of the BWROG EPGs. Subsequent to the NRC's approval of Revision 4 to the generic EPGs, Edison will upgrade the PSTGs to reflect the approved Revision 4, as necessary.

Detroit Edison anticipates that the BWROG will submit Revision 4 of the BWROG EPGs to NRC during September 1986. (This schedule constitutes a nine month slip from the December, 1985 submittal date targeted at the time of issuance of the Fermi 2 OL, and a one month slip from the August, 1986 submittal date targeted at the time of issuance of Reference 1.) Detroit Edison believes that there will be a few differences between the draft Revision 4AC EPGs used in the work to date and the final Revision 4 EPGs submitted by the BWROG. Further changes in the Revision 4 EPGs may result from NRC review. Thus, if Detroit Edison continues working toward submittal of the DCRDR Summary Report on the schedule specified in the Fermi 2 Operating License, it is likely that portions of the DCRDR will have to be repeated. This may also require NRC staff to repeat part or all of its review.

IV. Significant Hazards Consideration

The preceding license amendment request has been reviewed against the criteria in 10CFR50.92, and was determined not to represent a significant hazards consideration as delineated below.

- a) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Detroit Edison has performed several reviews of the control room to identify and disposition any human factors deficiencies present. The NRC's favorable evaluations of these reviews are discussed in the SER and SSERs 1 and 5. As noted in SSER 5, the Fermi 2 reviews to date have "...minimized the potential for operator error leading to serious consequences as a result of human factors considerations in the Fermi 2 control room." Therefore, the deferral in conducting the subject DCRDR will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- b) The subject license amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

The DCRDR schedule amendment requested ensures that the proper EPGs are considered in the evaluation of the control room. The amendment does not introduce the possibility of a new or different kind of accident since previous control room reviews have led to the approval of plant operation with the current control room configuration.

- c) The requested license amendment does not involve a significant reduction in the margin of safety. The requested amendment actually only defers to a later time the conduct of a control room review which is designed to further enhance safe plant operation beyond the current levels.

Conclusion

Based on the preceding discussion, Detroit Edison believes that it is more practical for both Detroit Edison and the NRC to amend the subject license condition as proposed above. The revision of this license condition to reflect milestones in lieu of calendar dates will support the goals of the license condition while potentially precluding future license amendments prompted by slips in milestone dates.

It should be noted that granting of the requested license amendments is expected to result in the implementation of the subject activities at the same point in the plant's operating history as was envisioned when the existing license conditions were developed.

Similarly, operation of Fermi 2 with the existing EOPs is warranted as noted in Section 22.2, Item I.C.1 of Supplement 1 to the Fermi 2 SER:

"Based on this review, the staff has concluded that the BWR Owners' Group Guidelines have been adequately incorporated into the Fermi 2 procedures. The staff review of the BWR Owners' Group Guidelines is continuing; however, the Fermi 2 procedures based on the January 31, 1981 generic guidelines are acceptable for interim full-power operation of Fermi 2."

## References

- 1) Detroit Edison letter to NRC, "Request for License Amendment to Modify License Conditions on Emergency Operating Procedures (EOP) and Detailed Control Room Design Review (DCRDR)", VP-86-0043, dated June 19, 1986.
- 2) Detroit Edison letter to NRC, "Control Room Design Review (CRDR) Program Plan", EF2-72747, dated August 16, 1984.