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Detroit Edison



August 17, 1999
NRC-99-0089

U. S. Nuclear Regulatory Commission
Attention: 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 NRC, NRC-98-0043,
"Proposed Technical Specification Change
(License Amendment) - Conversion to
Improved Standard Technical Specifications",
dated April 3, 1998

Subject: Transmittal of Revision 13 to Fermi 2 Improved
Technical Specification Submittal (TAC No. MA1465)

Attached please find Revision 13 to the Fermi 2 Improved Technical Specification (ITS) Submittal (Reference 2). The purpose of this revision is to provide an update for the remaining open issues associated with NRC review of the ITS submittal.

Attachment 1 contains a brief abstract of the changes included in this revision. Attachment 2 contains the revised pages for the submittal along with revision instructions.

Attachment 3 provides updated No Significant Hazards Considerations (NSHC) evaluations for changes designated as LR. As requested by the NRC staff an evaluation is being provided for each LR designated change. These evaluations replace the generic LR NSHC evaluation contained in Reference 2.

Detroit Edison plans to implement the ITS within 90 days of the issuance of the ITS license amendment.

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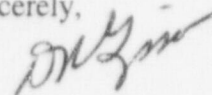
Upon implementation of the ITS license amendment, Detroit Edison will schedule the performance of new and revised Surveillance Requirements (SRs) as follows:

1. For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.

In the Reference 2 submittal and its revisions, Detroit Edison committed to relocate certain Technical Specification requirements to documents under Detroit Edison's control. The relocation of these requirements to the appropriate documents as described in Reference 2 and the subsequent revisions will be completed within 90 days of implementation of the ITS license amendment.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

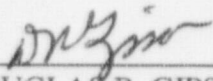
Sincerely,



Attachments

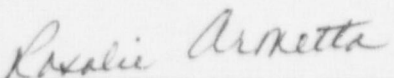
cc: A. J. Kugler
A. Vogel
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

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
Senior Vice President, Nuclear Generation

On this 17th day of August, 1999 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

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

**ATTACHMENT 1 TO
NRC-99-0089**

**ABSTRACT OF REVISION 13 TO THE FERMI 2 IMPROVED TECHNICAL
SPECIFICATION SUBMITTAL**

Abstract of Revision 13 to the Fermi 2 Improved Technical Specification Submittal

Revision 13 to the Fermi 2 Improved Technical Specification (ITS) submittal incorporates issues remaining from NRC review of the ITS. Revision bars are provided to aid in identification of the changed material. For those changes associated with an RAI, the RAI number is included with the revision bar.

Minor corrections are included in this revision. These changes consist of various format, spelling, labeling, and editorial enhancement and/or technical changes typically identified during implementation preparation. The revision bars for these changes are, except where noted, marked with a circled "A".

The following lists specific changes in Revision 13:

- The clean typed definition of Dose Equivalent I-131 has been corrected to correspond to the ISTS markup.
- ITS 3.0 Discussion of Change (DOC) A.6 has a corrected reference to Specification 5.5.11.
- The Background section of the Bases for ITS 3.1.2 has been corrected to remove references to rod density as a measure of core reactivity to be consistent with the LCO.
- The Bases for ITS 3.1.7 has a statement added that the Standby Liquid Control piping is drained and flushed after demonstrating the flow path exists between the storage tank and explosive valve.
- The Bases for ITS B3.3.1.1 has been revised to more clearly state the bases for isolating the Main Steam Lines in Condition H.
- ITS Table 3.3.3.2-1 has been modified to more clearly indicate that the listed items represent functions.
- The clean typed and ISTS markup for Condition B of ITS 3.3.6.3 have been reconciled.
- The ISTS 3.4.1 provisions to reset core thermal limits for single loop operation have been adopted.
- ITS 3.6.1.3 Action D has been modified consistent with a proposed revision to generic change TSTF-207. This change is marked with a circled "B".
- The clean typed SR 3.6.1.3.3 has been corrected to correspond to the ISTS markup.

- 3.6.1.7 DOC A.6 has been deleted since it is not used.
- In SRs 3.6.1.8.2 and 3.6.1.8.3, the term "required" used in the ISTS has been eliminated since, for the Fermi 2 ITS, the LCO requires all the vacuum breakers to be Operable. A similar change was made to the Bases for Action A.1.
- A revision was made to the LCO Bases for ITS 3.6.4.2 to better reflect Fermi 2 requirements.
- DOC L.1 for ITS 3.7.2 was modified to more clearly show the intent of LCO 3.0.6.
- The current licensing basis for the Control Center Air Conditioning system surveillance requirements have been adopted in place of the more restrictive changes contained in the ISTS.
- LCO 3.9.8 and associated Note 2, as well as SR 3.9.8.1 have been editorially modified to be consistent with ISTS usage.
- Clean typed LCO 3.10.5 has been modified to correspond to the ISTS markup.
- LCO 3.10.7 item a and SR 3.10.7.1 has been modified to include LCO 3.3.1.1 function 2.e. This function was added in a recent license amendment and should have been included in this LCO.
- In ITS 5.2.2.a, the ISTS usage of "non-licensed operators" has been adopted in place of the Fermi 2 specific titles.
- Throughout the CTS markup for ITS 5.5, references to DOC LA.9 have been replaced by DOC LR.1. DOC LA.9 was replaced by LR.1 in a previous revision of the submittal.
- DOC A.2 for ITS 3.7.1 has been change to a more restrictive category DOC, M.1.

In response to RAI 3.6.2.1-4, CTS surveillance has been included in the ITS as SR 3.6.1.1.3 instead of being relocated to the TRM.

In response to RAI 3.6.4.2-5 and RAI 3.6.1.3-10, the changes have now been characterized as less restrictive relocations and are covered by LA category DOCs.

**ATTACHMENT 2 TO
NRC-99-0089**

INSERT AND REMOVAL SHEETS