



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 11, 2021

Mr. Peter Dietrich
Senior Vice President
and Chief Nuclear Officer
DTE Electric Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI UNIT 2 - ISSUANCE OF AMENDMENT NO. 221 REGARDING
REVISION OF TECHNICAL SPECIFICATIONS TO ADOPT TSTF-563 "REVISE
INSTRUMENT TESTING DEFINITIONS TO INCORPORATE THE
SURVEILLANCE FREQUENCY CONTROL PROGRAM"
(EPID L-2020-LLA-0127)

Dear Mr. Dietrich:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 221 to Renewed Facility Operating License No. NPF-43, for Fermi Unit 2. The amendment consists of changes to the technical specifications (TSs) in response to your application dated June 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20157A169).

The amendment adopts Technical Specification Task Force (TSTF) Traveler TSTF-563, Revision 0, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program." TSTF-563 revises the TS definitions of Channel Calibration, Channel Operational Test, and Trip Actuating Device Operational Test.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Surinder S. Arora, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures:

1. Amendment No. 221 to NPF-43
2. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DTE ELECTRIC COMPANY

DOCKET NO. 50-341

FERMI 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 221
Renewed License No. NPF-43

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by DTE Electric Company dated June 5, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-43 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 221, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed license. DTE Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Nancy L. Salgado, Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. NPF-43
and Technical Specifications

Date of Issuance: June 11, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 221

FERMI 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

DOCKET NO. 50-341

Renewed Facility Operating License No. NPF-43

Replace the following page of the Renewed Facility Operating Licenses No. NPF-43 with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

REMOVE

- 4 -

INSERT

- 4 -

Technical Specifications

Replace the following pages of the Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

1.1-1

1.1-2

INSERT

1.1-1

1.1-2

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 221, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed license. DTE Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

DTE Electric Company shall abide by the agreements and interpretations between it and the Department of Justice relating to Article I, Paragraph 3 of the Electric Power Pool Agreement between DTE Electric Company and Consumers Power Company as specified in a letter from The Detroit Edison Company to the Director of Regulation, dated August 13, 1971, and the letter from Richard W. McLaren, Assistant Attorney General, Antitrust Division, U.S. Department of Justice, to Bertram H. Schur, Associate General Counsel, Atomic Energy Commission, dated August 16, 1971.

(4) Deleted

(5) Deleted

(6) Deleted

(7) Deleted

(8) Deleted

(9) Modifications for Fire Protection (Section 9.5.1, SSER #5 and SSER #6)*

DTE Electric Company shall implement and maintain in effect all provisions of the approved fire protection program as described in its Final Safety Analysis Report for the facility through Amendment 60 and as approved in the SER through Supplement No. 5, subject to the following provision:

- (a) DTE Electric Company may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report (SER) and/or its supplements wherein the license condition is discussed.

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----
The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)	The APLHGR shall be applicable to a specific planar height and is equal to the sum of the LHGRs for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle at the height.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. A CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. A CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

(continued)

1.1 Definitions (continued)

CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.
CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. A CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CORE ALTERATION	<p>CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:</p> <ul style="list-style-type: none">a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); andb. Control rod movement, provided there are no fuel assemblies in the associated core cell. <p>Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.</p>

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 221 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-43

DTE ELECTRIC COMPANY

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION

By application dated June 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20157A169), DTE Electric Company (DTE, the licensee) submitted a license amendment request (LAR) to revise the technical specifications (TSs) for Fermi Unit 2 (Fermi 2).

The amendment would revise the current instrumentation testing definitions of channel calibration and channel functional test to permit determination of the appropriate frequency to perform the surveillance requirement (SR) based on the devices being tested in each step. The proposed changes are based on Technical Specifications Task Force (TSTF) Traveler TSTF-563, Revision 0, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program," dated May 10, 2017 (ADAMS Accession No. ML17130A819). The U.S. Nuclear Regulatory Commission (NRC, the Commission) issued a final safety evaluation (SE) approving TSTF-563, Revision 0, on December 4, 2018 (ADAMS Accession No. ML18333A152).

A surveillance frequency control program (SFCP) was incorporated into the Fermi 2 TSs by Amendment No. 201 by letter dated July 14, 2015 (ADAMS Accession No. ML15155B416).

The licensee has proposed variations from the TS changes described in TSTF-563. The variations are described in Section 2.2.1 of this SE and evaluated in Section 3.1.

2.0 REGULATORY EVALUATION

2.1 Description of SFCP and Instrument Testing

The TSs require the surveillances for instrumentation channels be performed within the specified frequency, using any series of sequential, overlapping, or total channel steps. A prior amendment approved by the NRC on July 14, 2015, revised the TSs to relocate all periodic surveillance frequencies to licensee control. Changes to the relocated surveillance frequencies

are made in accordance with the TS program referred to as the SFCP. The SFCP allows a new surveillance frequency to be determined for the channel, but that frequency must consider all components in the channel and applies to the entire channel.

A typical instrument channel consists of many different components, such as sensors, rack modules, and indicators. These components have different short-term and long-term performance (drift) characteristics, resulting in the potential for different calibration frequency requirements. Under the current TSs, the most limiting component calibration frequency for the channel must be chosen when a revised frequency is considered under the SFCP. As a result, all components that makeup a channel must be calibrated at a frequency equal to the channel component with the shortest (i.e., most frequent) surveillance frequency.

Some channel components, such as pressure transmitters, are very stable with respect to drift and could support a substantially longer calibration frequency than the other components in the channel. Currently, the SRs in many plants are performed in steps (e.g., a pressure sensor or transmitter is calibrated during a refueling outage and the rack signal conditioning modules are calibrated while operating at power). The proposed change extends this concept to permit the surveillance frequency of each step to be determined under the SFCP based on the component(s) surveilled in the step instead of all components in the channel. This will allow each component to be tested at the appropriate frequency based on the component's long-term performance characteristics.

Allowing an appropriate surveillance frequency for performing a channel calibration on each component or group of components could reduce radiation dose associated with in-place calibration of sensors, reduce wear on equipment, reduce unnecessary burden on plant staff, and reduce opportunities for calibration errors.

2.2 Proposed Changes to the TSs

Currently, the channel calibration and channel functional test may be performed by any series of sequential, overlapping or total channel steps. The proposed changes to the TSs would revise the definitions of channel calibration and channel functional test to indicate that the step must be performed within the most limiting frequency for the components included in that step by adding the phrase “, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step” at the end of the last sentence of each definition.

The following paragraph denotes the changes to the channel calibration definition. Changes are shown in ***bold italics***:

A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. A CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. A CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, ***and each step must be***

performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

The following paragraph denotes the changes to the channel functional test definition. Changes are shown in ***bold italics***:

A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. A CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps, ***and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.***

The various instrumentation functions in the TSs require surveillances to verify the correct functioning of the instrument channel. The proposed change extends the definition of instrumentation channel components to permit the surveillance frequency of each step to be determined under the SFCP based on the component(s) surveilled in the step instead of all components in the channel. This will allow each component to be tested at the appropriate frequency based on the component's long-term performance characteristics.

The proposed changes in the definition for instrument testing would also allow the licensee to control the frequency of associated components being tested in each step. The SR for the overall instrumentation channel remains unchanged. The proposed change has no effect on the design, fabrication, use, or methods of testing the instrumentation channels, and will not affect the ability of the instrumentation to perform the functions assumed in the safety analysis.

These instrumentation testing definitions state that, "[t]he [test type] may be performed by means of any series of sequential, overlapping, or total channel steps." The surveillance frequency of these subsets would be established based on the characteristics of the components in the step rather than the most limiting component characteristics in the entire channel. Each of these steps would be evaluated in accordance with the SFCP.

2.2.1 Variations from TSTF-563

The licensee is proposing the following variations from the TS changes described in TSTF-563 or the applicable parts of the NRC staff's SE of TSTF-563.

The Fermi 2 TS definition of CHANNEL CALIBRATION uses slightly different wording than Revision 4 of the General Electric BWR/4 Standard TS (Standard Technical Specification (STS)) (NUREG- 1433) on which TSTF-563 is based. Specifically, the Fermi 2 definition uses "**A** CHANNEL CALIBRATION..." rather than "***The*** CHANNEL CALIBRATION..." (bold italics show the difference).

The Fermi 2 TS definition of CHANNEL FUNCTIONAL TEST uses slightly different wording than Revision 4 of the General Electric BWR/4 STS (NUREG-1433) on which TSTF-563 is based. Specifically, the Fermi 2 definition uses "**A** CHANNEL FUNCTIONAL TEST..." rather than "***The*** CHANNEL FUNCTIONAL TEST..." (bold italics show the difference).

2.3 Applicable Regulatory Requirements and Guidance

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1) requires each applicant for a license authorizing operation of a utilization facility to include in the application the proposed TSs.

The regulation at 10 CFR 50.36(b) requires:

Each license authorizing operation of a ... utilization facility ... will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to [10 CFR] 50.34 ["Contents of applications; technical information"]. The Commission may include such additional technical specifications as the Commission finds appropriate.

The categories of items required to be in the TSs are provided in 10 CFR 50.36(c). One such category is SRs, which are defined in 10 CFR 50.36(c)(3) as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

TS 5.5.15 requires the licensee to establish, implement, and maintain, an SFCP to ensure that TS SRs are performed at intervals listed in, and controlled by, the SFCP. TS 5.5.15 also requires that changes surveillance frequencies listed in the SFCP be made in accordance with NRC staff-approved Nuclear Energy Institute (NEI) 04-10, Revision 1, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies, Industry Guidance Document," dated April 2007 (ADAMS Accession No. ML071360456).

NEI 04-10, Revision 1, describes an evaluation process and a multi-disciplinary plant decision-making panel that considers the detailed evaluation of proposed surveillance frequency revisions. The evaluations are based on operating experience, test history, manufacturers' recommendations, codes and standards, and other deterministic factors, in conjunction with risk insights. The evaluation considers all components being tested by the SR. Process elements are included for determining the cumulative risk impact of the changes, updating the licensee's probabilistic risk assessment (PRA) models, and for imposing corrective actions, if necessary, following implementation of a revised frequency.

The NRC staff's guidance for the review of TSs is in Chapter 16.0, "Technical Specifications," of NUREG-0800, Revision 3, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), dated March 2010 (ADAMS Accession No. ML100351425). As described therein, as part of the regulatory standardization effort, the NRC staff has prepared an STS for each of the LWR nuclear designs. Accordingly, the NRC staff's review includes consideration of whether the proposed changes are consistent with the applicable reference STS (i.e., the current STS), as modified by NRC-approved Travelers. In addition, the guidance states that comparing the change to previous STS can help clarify the TS intent.

Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," dated May 2011 (ADAMS Accession No. ML100910006), describes an acceptable risk-informed approach for assessing the nature and impact of proposed permanent licensing

basis changes by considering engineering issues and applying risk insights. This regulatory guide also provides risk acceptance guidelines for evaluating the results of such evaluations.

RG 1.177, Revision 1, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," dated May 2011 (ADAMS Accession No. ML100910008), describes an acceptable risk-informed approach specifically for assessing proposed TS changes.

RG 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," dated March 2009 (ADAMS Accession No. ML090410014), describes an acceptable approach for determining the technical adequacy of PRAs.

The NRC staff's guidance for evaluating the technical basis for proposed risk-informed changes is provided in SRP, Chapter 19, Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance," dated June 2007 (ADAMS Accession No. ML071700658). The NRC staff's guidance for evaluating PRA technical adequacy is provided in SRP, Chapter 19, Section 19.1, Revision 3, "Determining the Technical Adequacy of Probabilistic Risk Assessment for Risk-Informed License Amendment Requests After Initial Fuel Load," dated September 2012 (ADAMS Accession No. ML12193A107). More specific guidance related to risk-informed TS changes is provided in SRP, Chapter 16, Section 16.1, Revision 1, "Risk-Informed Decision Making: Technical Specifications," dated March 2007 (ADAMS Accession No. ML070380228), which includes changes to surveillance test intervals (STIs) (i.e., surveillance frequencies) as part of risk-informed decision-making. Section 19.2 of the SRP references the same criteria as RG 1.177, Revision 1, and RG 1.174, Revision 2, and states that a risk-informed application should be evaluated to ensure that the proposed changes meet the following key principles:

- The proposed change meets the current regulations, unless it explicitly relates to a requested exemption or rule change.
- The proposed change is consistent with the defense-in-depth philosophy.
- The proposed change maintains sufficient safety margins.
- When proposed changes result in an increase in risk associated with core damage frequency or large early release frequency, the increase(s) should be small and consistent with the intent of the Commission's Safety Goal Policy Statement.
- The impact of the proposed change should be monitored using performance measurement strategies.

The NRC's, "Standard Technical Specifications, General Electric BWR/4 Plants" NUREG-1433, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12104A192 and ML12104A193, respectively), provide standard TSs for General Electric-designed boiling-water reactors.

3.0 TECHNICAL EVALUATION

Revising the frequency of a channel calibration and channel functional test instrument channel under the SFCP requires assurance that component performance characteristics, such as drift

between each test, will not result in undetected instrument errors that exceed the assumptions of the safety analysis and supporting instrument loop uncertainty calculations. These requirements are consistent with the methodology described in NEI 04-10, which is required by the SFCP. The SFCP does not permit changes to the TS Allowable Values or Nominal Trip Setpoints; but allows only the surveillance frequency to be changed when determined permissible by NEI 04-10. Therefore, prior to extending the test intervals for an instrument channel component or components associated with a given calibration step, the component performance characteristics must be evaluated to verify the Allowable Value or Nominal Trip Setpoint will still be valid and to establish a firm technical basis supporting the extension. In addition, each change must be reviewed by the licensee to ensure the applicable uncertainty allowances are conservative (bounding) (e.g., sensor drift, rack drift, indicator drift). Documentation to support the changes shall be retained per the guidance in NEI 04-10.

Five key safety principles that must be evaluated before changing any surveillance frequency are identified in Section 3.0 of NEI 04-10. Principle 3 requires confirmation of the maintenance of safety margins, which, in this case, includes performance of deterministic evaluations to verify preservation of instrumentation trip setpoint and indication safety margins.

The evaluation methodology specified in NEI 04-10 also requires consideration of common-cause failure effects and monitoring of the instrument channel component performance following the frequency change to ensure channel performance is consistent with the analysis to support an extended frequency.

The method of evaluating a proposed surveillance frequency change is not dependent on the number of components in the channel. Each step needs to be evaluated to determine the acceptable surveillance frequency for that step. The proposed change to permit changing the surveillance frequency of channel component(s) does not affect the test method or evaluation method. The requirement to perform a channel calibration or channel functional test on the entire channel is not changed.

For example, an evaluation in accordance with NEI 04-10 may determine that a field sensor (e.g., a transmitter) should be calibrated every 48 months, that the rack modules should be calibrated every 30 months, and the indicators should be calibrated every 24 months. Under the current TS requirements, all devices in the channel must be calibrated every 24 months. However, under the proposed change, sensors, rack modules, and indicators would be calibrated at the appropriate frequency for the tested devices. As required by the channel calibration definition, the test would still encompass all devices in the channel required for channel operability.

Per TS 5.5.15, the NEI 04-10 methodology must be used to evaluate surveillance frequency changes to determine if such SR extensions could be applied. Process elements are used to determine the cumulative risk impact of changes, update the PRA, and impose corrective actions, if needed, following implementation. Several steps are required by NEI 04-10, Section 4.0, Step 7, to be evaluated prior to determining the acceptability of changes. These steps include history of surveillance tests, industry and plant specific history, impact on defense in depth, vendor recommendations, required test frequencies for the applicable codes and standards, ensuring that plant licensing basis would not be invalidated and other factors. The NRC staff finds these measures acceptable in determining the SR extensions.

In addition, NEI 04-10, Section 4.0, Step 16, requires an Independent Decision-Making Panel (IDP) to review the cumulative impact of all STI changes over a period of time. This is also

required by RGs 1.174 and 1.177. The IDP is composed of the site Maintenance Rule Expert Panel, Surveillance Test Coordinator, and Subject Matter Expert, who is a cognizant system manager or component engineer. Based on the above information, the NRC staff finds that the setpoint changes will be tracked in an acceptable manner.

Licensees with an SFCP may currently revise the surveillance frequency of instrumentation channels. The testing of these channels may be performed by means of any series, sequential, overlapping, or total channel steps. However, all required components in the instrumentation channel must be tested in order for the entire channel to be considered Operable.

The NRC staff notes that industry practice is to perform instrument channel surveillances, such as channel calibrations and channel functional tests, using separate procedures based on the location of the components. Each of these procedures may be considered a "step." The results of all these procedures are used to satisfy the SRs using the existing allowance to perform it "by means of any series of sequential, overlapping, or total channel steps." The proposed changes would allow for determining an acceptable surveillance frequency for each step.

The NRC staff notes that the NEI 04-10 methodology includes the determination of whether the structure, system, and components (SSCs) affected by a proposed change to a surveillance frequency are modeled in the PRA. Where the SSC is directly or implicitly modeled, a quantitative evaluation of the risk impact may be carried out. The methodology adjusts the failure probability of the impacted SSCs based on the proposed change to the surveillance frequency. Where the SSC is not modeled in the PRA, bounding analyses are performed to characterize the impact of the proposed change to the surveillance frequency. Potential impacts on the risk analyses due to screening criteria and truncation levels are addressed by the requirements for PRA technical adequacy, consistent with the guidance contained in RG 1.200, and by sensitivity studies identified in NEI 04-10. The licensee is not proposing to change the methodology, or the acceptance criteria for extending STIs, and the licensee will need to evaluate changes in the frequency for performing each of the steps in the instrumentation surveillance test per the methodology in NEI 04-10.

Therefore, the NRC staff concludes that the proposed change determines an acceptable test frequency for individual steps within instrumentation channel surveillance tests is acceptable because any extended STIs will be developed within the established constraints of the SFCP and NEI 04-10.

The regulatory requirements in 10 CFR 50.36 are not specific regarding the frequency of performing surveillance tests. The proposed change only affects the frequency of performance and does not affect the surveillance testing method or acceptance criteria. Therefore, the proposed change is consistent with the surveillance testing requirements of 10 CFR 50.36.

PRA Acceptability

The guidance in RG 1.200 states that the quality of a licensee's PRA should be commensurate with the safety significance of the proposed TS change and the role the PRA plays in justifying the change. That is, the greater the change in risk or the greater the uncertainty in that risk as a result of the requested TS change, or both, the more rigor that should go into ensuring the quality of the PRA.

The NRC staff has performed an assessment of the PRA models used to support the approved SFCP that uses NEI 04-10, using the guidance of RG 1.200 to assure that the PRA models are

capable of determining the change in risk due to changes to surveillance frequencies of SSCs, using plant-specific data and models. Capability Category II of the NRC-endorsed PRA standard is the target capability level for supporting requirements for the internal events PRA for this application. Any identified deficiencies to those requirements are assessed further to determine any impacts to proposed decreases to surveillance frequencies, including the use of sensitivity studies, where appropriate, in accordance with NEI 04-10.

The SFCP permits revising of the surveillance frequency for instrumentation channels. The NRC staff evaluated whether NEI 04-10 can be applied to subsets in an instrument channel when the SFCP currently specifies a surveillance interval that is applied to the entire channel. The NRC staff notes that the current channel surveillance may be performed by means of any series of sequential, overlapping, or total channel steps. In practice, this means that a channel is divided into subsets and each subset is tested separately. Therefore, the current instrument channel testing is already composed of a sequence of individual tests.

The instrument function may be modeled in the PRA differently depending on the site and the function (e.g., channel may be modeled individually, subsets may be modeled, or the channel function may be modeled as a single entity). There are different steps through the evaluation methodology in NEI 04-10 that could be used based on the different PRA modeling approaches. The appropriate modeling of these different approaches is included in the NRC staff's review of the PRA modeling during the review of the application to implement an SFCP that uses NEI 04-10.

The PRA in use at Fermi 2 is the same as that was used to support the license amendment that authorized the SFCP and follows NEI 04-10. Currently, the TSs allow the licensee to change the surveillance frequency of an entire channel under the SFCP. The amendment will allow the licensee to change the surveillance frequency of each subset of the channel. The NRC staff finds that changes to the surveillance frequency caused by defining and using individual, testable component subsets can be appropriately evaluated with the current SFCP and the current PRAs. The NRC staff finds that the risk-informed methodology review and the PRA acceptability review that were performed during the review of the application for an amendment authorizing the SFCP that uses NEI 04-10 is adequate.

The NRC staff determined that the proposed changes to the TS meet the standards for TS in 10 CFR 50.36(b). The regulations at 10 CFR 50.36 require that TS include items in specified categories, including SRs. The proposed changes modify the definitions applicable to instrumentation channel components but do not alter the technical approach that was approved by the NRC in NEI 04-10, and the TS, as revised, continue to specify the appropriate SRs for tests and inspections to ensure the necessary quality of affected SSCs is maintained.

Additionally, the NRC staff finds the proposed TS changes to be technically clear and consistent with customary terminology and format in accordance with SRP Chapter 16.0. The NRC staff reviewed the proposed changes against the regulations and concludes that the changes continue to meet the requirements of 50.36(b), 50.36(c)(3), and 50.36(c)(5), of 10 CFR, for the reasons discussed above, and thus provide reasonable assurance that the revised TSs provide the requisite requirements and controls for the facility to operate safely. Therefore, the NRC staff concludes that the proposed TS changes are acceptable.

3.1 Variations from TSTF-563

The licensee described variations from TSTF-563 in Section 2.2 of the LAR. The NRC staff reviewed the variations to the CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST definitions and determined that they are acceptable because the differences are editorial in nature and do not affect the applicability of TSTF-563 to the proposed LAR.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment on March 18, 2021. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, as published in the *Federal Register* on August 25, 2020 (85 FR 52373), and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: T. Sweat, NRR

Date of issuance: June 11, 2021

SUBJECT: FERMI UNIT 2 - ISSUANCE OF AMENDMENT NO. 221 REGARDING
REVISION OF TECHNICAL SPECIFICATIONS TO ADOPT TSTF-563 "REVISE
INSTRUMENT TESTING DEFINITIONS TO INCORPORATE THE
SURVEILLANCE FREQUENCY CONTROL PROGRAM"
(EPID L-2020-LLA-0127) DATED JUNE 11, 2021

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