

**From:** [Arora, Surinder](#)  
**To:** [Margaret M Offerle](#)  
**Cc:** [Wiebe, Joel](#); [Salgado, Nancy](#)  
**Subject:** Fermi 2 - License Amendment Request: Request for Additional Information (EPID L-2021-LLA-0057)  
**Date:** Friday, July 23, 2021 10:33:00 AM  
**Attachments:** [Fermi 2 RAI \(EMIB dated 7-21-2021\) SA.docx](#)

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Ms. Offerle,

By letter dated March 31, 2021 (Agencywide Documents Access Management System (ADAMS) Accession No. ML21090A194), DTE Electric Company (DTE, the licensee) submitted for the NRC staff review and approval the proposed revisions to Fermi 2 technical specification to remove some obsolete information, make minor corrections, and make miscellaneous editorial changes.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the above request and has determined that response to the attached request for additional information (RAI) is needed from DTE to complete its review. Please review the attached RAI to ensure that the staff's question is understandable, the regulatory basis is clear, and there is no proprietary information contained in the draft RAI. Please also let me know if DTE wishes to have a clarification phone call and how much time you will need to respond to the RAI. Our default response schedule will be 30 days from the date of this email unless we hear from you otherwise.

Thank you,

**SURINDER ARORA, PE**

Project Manager, Fermi 2  
US NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION (NRR)  
DIVISION OF OPERATING REACTOR LICENSING (DORL)  
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**NOTE: In the Clarification Call on July 29, 2021, the licensee confirmed that there was no need to resend the final RAI. Since no change is needed as a result of the clarification call, they can work with this version that they already have.**

Docket No. 50-341

EPID: L-2021-LLA-0057

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED LICENSE AMENDMENT TO REVISE TECHNICAL SPECIFICATION 3.5.4.1.c

FERMI NUCLEAR GENERATING STATION, UNIT 2

DTE ELECTRIC COMPANY

DOCKET NO. 50-341

References:

1. Letter dated March 31, 2021 (Agencywide Documents Access Management System (ADAMS) Accession Number ML21090A194) from DTE Electric Company, proposing revisions to Fermi 2 technical specifications (TS) to remove some obsolete information, make minor corrections, and make miscellaneous editorial changes.
2. Fermi 2 technical specification (ADAMS Accession No. ML053060228).
3. NUREG-0667, "Probability of the Intersystem LOCA: Impact Due to Leak Testing and Operation Changes," (ADAMS Accession No. ML19323E667).

The NRC staff has reviewed the Fermi 2 license amendment request (Reference 1), specifically, the proposed change to TS surveillance requirement (SR) 3.4.5.1.c, and requires the following additional information to complete its review:

**EMIB-RAI-1:**

The amendment request proposes a change in the wording of SR 3.4.5.1.c for isolation check valves (E1100F050A and E1100F050B) from the term "testable check valves" to just "valves." The current TS 3.4.5 uses description of these isolation valves as "check valves." The NRC staff also reviewed the Fermi 2 TS Bases, the Inservice Testing (IST) Program, and the NRC approved Alternative Request No. RR-VRR-003 (ADAMS Accession No. ML20014E731) and found that all these documents describe these isolation valves as "testable check valves." Furthermore, the Fermi 2 TS Bases 3.5.4 states, in part, that "A study (NUREG-0677) evaluated various PIV configurations to determine the probability of intersystem LOCAs. This study concluded that periodic leakage testing of the PIVs can substantially reduce intersystem LOCA probability." This study cited in NUREG-0677 only considered "check valves," for evaluation. Therefore, NRC staff considers the proposed change to be inconsistent with the terminology used in other documents and these isolation valves should be "check valves" instead of just "valves."

Based on the above, please justify the proposed change to SR 3.4.5.1.c which changes the term "testable check valves" to just "valves."