



August 27, 2021
NRC-21-0046

10 CFR 71.106

Attention: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Fermi 1 Power Plant
NRC Docket No. 50-16
NRC Docket No. 71-0526
NRC License No. DPR-9

Fermi 2 Power Plant
NRC Docket No. 50-341
NRC Docket No. 71-0526
NRC License No. NPF-43

Subject: Report of Changes to Quality Assurance Program for Radioactive Material Packages

- References:
- 1) Letter from NRC to DTE, "Revised Quality Assurance Program Approval Form for Radioactive Material Packages No. 0526, Revision 6," dated August 28, 2015 (ML15244A004)
 - 2) DTE Letter NRC-19-0063, "Report of Changes to Quality Assurance Program for Radioactive Material Packages," dated August 21, 2019 (ML19233A207)
 - 3) DTE Letter NRC-21-0002, "Submittal of Revision 23 to the Fermi 2 Updated Final Safety Analysis Report (UFSAR), 10 CFR 50.59 and 10 CFR 72.48 Evaluation Summary Reports, Commitment Management Report, Revisions to the Technical Requirements Manual and the Technical Specifications Bases, and a Summary of the Excessive Detail Removed from the UFSAR," dated February 2, 2021
 - 4) DTE Letter NRC-09-0072, "Renewal of Quality Assurance Program Approval for Radioactive Material Packages," dated October 29, 2009 (ML093100305)
 - 5) DTE Letter NRC-20-0068, "Submittal of Biennial Review of the Fermi 1 Safety Analysis Report," dated November 25, 2020 (ML20330A289)

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 71.106(b), DTE Electric Company (DTE), is submitting a 24-month update of changes made to approved Radioactive Material Packages Quality Assurance Program No. 0526. In Reference 1, the NRC transmitted a revised 10 CFR Part 71 Quality Assurance Program Approval for Radioactive Material Packages (i.e., NRC Form 311, Approval No. 0526, Revision 6) for activities conducted at DTE's Fermi 1 and Fermi 2. The regulations in 10 CFR 71.106 require that changes to the approved Quality Assurance Program that do not reduce commitments must be submitted to the NRC every 24-months, with the reporting period starting on the date the revised NRC Form 311 was approved (i.e., August 28, 2015).

Changes made to the Radioactive Material Packages Quality Assurance Program in the previous reporting period were submitted under Reference 2. Note that Reference 2 was submitted a few days prior to the end of the previous 24-month reporting period; however, no changes were made between the Reference 2 letter (i.e., August 21, 2019) and the end of the previous reporting period (i.e., August 27, 2019).

This letter provides a report of changes made to the Radioactive Material Packages Quality Assurance Program that do not reduce commitments for the 24-month period of August 28, 2019 through August 27, 2021.

In Reference 3, DTE submitted Revision 23 of the Fermi 2 Updated Final Safety Analysis Report (UFSAR). As identified in Reference 4, the 10 CFR 50, Appendix B, Quality Assurance Program documented in Section 17.2 of the Fermi 2 UFSAR is utilized to satisfy the Quality Assurance requirements of 10 CFR 71. A summary of the changes included in Revision 23 of Section 17.2 of the UFSAR, but that were not already summarized in the Reference 2 report, is provided below:

- Minor administrative improvements, clarifications, spelling corrections, and changes to punctuation or editorial items were made. These types of changes are not a reduction in commitment of the Quality Assurance Program consistent with the examples in 10 CFR 71.106(b).
- The Plant Support department was reorganized under other department titles and reporting structures. Some of the responsibilities and reporting organizations previously held by or reporting to or through the Plant Support department are transferred to other departments. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(5).
- The position title of Manager - Nuclear Training was revised to Director - Nuclear Training. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(2).
- The description of the number of Onsite Review Organization (OSRO) members was clarified. This change was not a reduction in commitment of the Quality Assurance Program consistent with the examples in 10 CFR 71.106(b).
- The position title of Chief Operating Officer was revised to Chief Executive Officer while also removing the stand-alone discussion of the Executive Board Chairman. This

change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(2).

- The frequency of Nuclear Safety Review Group (NSRG) meetings was clarified from once per six months to twice per year. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b).
- Procurement of calibration and/or testing services from domestic and international laboratories was revised to permit accreditation to ISO/IEC-17025:2017 in addition to ISO/IEC-17025:2005. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(1).
- The discussion of human performance responsibilities was relocated from the Nuclear Performance Improvement organization to the Executive Director - Nuclear Production organization. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(5).
- Revisions were made regarding the available grace period for audits. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(1).
- The discussion of industrial health and safety responsibilities was relocated from the Radiation Protection organization to the Executive Director - Nuclear Production organization. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(5).
- The Nuclear Projects and Business Operations department was renamed to the Strategic Business Operations department and reorganized to report directly to the Senior Vice President and Chief Nuclear Officer. Additionally, the specific position title of Manager - Nuclear Strategy and Business Support was replaced with a generic discussion of the position. These changes were not a reduction in commitment of the Quality Assurance Program consistent with the examples in 10 CFR 71.106(b)(2) and (b)(5).
- A new position of Vice President - Engineering and Technical Support was created. Some existing responsibilities and reporting organizations previously held by or reporting to or through the Site Vice President were transferred to this new position. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(5).
- The portions of the Major Enterprise Projects (MEP) group performing activities subject to the Quality Assurance Program were relocated from a functional role provided by Corporate Support to being under direct control of the Fermi 2 organizational structure and the group was renamed Nuclear Technical Support - Project Management. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(5).
- The specific position title of Supervisor - Materials was replaced with a generic discussion of the position. This change is not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(2).
- The description of the process for maintaining proficiency of audit personnel was revised to provide clarification. This change was not a reduction in commitment of the Quality Assurance Program consistent with the examples in 10 CFR 71.106(b).

- Provisions were added to allow for remote surveillances to be used when a pandemic or similar state of emergency has been declared restricting access or travel. This change was not a reduction in commitment of the Quality Assurance Program consistent with the example in 10 CFR 71.106(b)(1).

DTE has made no additional changes to the Fermi 2 Quality Assurance Program since the submittal of UFSAR Revision 23 in Reference 3.

For Fermi 1, the Radioactive Material Packages Quality Assurance Program is implemented through Fermi 2 UFSAR Chapter 17 and Fermi 1 Safety Analysis Report (F1SAR) Sections 6.2 and 6.5. Reference 5 identifies no changes in the previous 24 months to either Sections 6.2 or 6.5 of the F1SAR. The Reference 5 submittal does describe minor changes to Fermi 1 documents, but which did not actually impact the F1SAR Quality Assurance Program description. These changes were not a reduction in commitment of the Quality Assurance Program consistent with the examples in 10 CFR 71.106(b). In addition, no changes to the F1SAR have been made since the Reference 5 submittal.

As indicated above, these changes did not reduce the commitment in the Radioactive Material Packages Quality Assurance Program.

No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact me at (734) 586-4273.

Sincerely,



Margaret M. Offerle for

Ertman L. Bennett III
Manager - Nuclear Licensing

cc: NRC Project Manager
NRC Resident Office
Regional Administrator, Region III