



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

February 24, 2023

Mr. Peter Dietrich
Senior VP and Chief Nuclear Officer
DTE Electric Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMIL 2 – AUDIT PLAN IN SUPPORT OF REVIEW OF LICENSE
AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENTS RELATING TO EMERGENCY DIESEL
GENERATOR VOLTAGE AND FREQUENCY (EPID L-2022-LLA-0188)

Dear Mr. Dietrich:

By letter dated December 16, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22350A504), DTE Electric Company (DTE, the licensee) submitted a license amendment request (LAR) for Fermi 2, regarding changes to Technical Specification (TS) 3.8.1, "AC Sources - Operating." Specifically, the LAR proposes to revise Surveillance Requirements 3.8.1.2, 3.8.1.7, 3.8.1.10, 3.8.1.11, 3.8.1.14, and 3.8.1.17, by revising the steady-state voltage and frequency acceptance criteria for each emergency diesel generator.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed DTE's LAR and determined that a regulatory audit would assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information.

The audit will be conducted to increase the NRC staff's understanding of the LAR and identify information that will require docketing to support the NRC staff's regulatory findings. The audit will be conducted from March 6, 2023 to March 31, 2023, through an online portal (also known as electronic portal, ePortal, or electronic reading room) established by DTE. The enclosed audit plan was discussed with your staff on February 15, 2023.

P. Dietrich

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If you have any questions, please contact me by telephone at 301-415-1421 or e-mail to Surinder.Arora@nrc.gov.

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

Enclosure:
Audit Plan

cc: Listserv



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REGULATORY AUDIT PLAN
TO SUPPORT REVIEW OF LICENSE AMENDMENT REQUEST
TO REVISE FERMI 2 TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENTS RELATING TO EMERGENCY DIESEL GENERATOR
VOLTAGE AND FREQUENCY
DOCKET NO. 50-341

1.0 BACKGROUND

By letter dated December 16, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22350A504), DTE Electric Company (DTE, the licensee) submitted a license amendment request (LAR) for changes to Fermi 2 Technical Specification (TS) 3.8.1, "AC Sources - Operating." Specifically, the LAR proposes to revise Surveillance Requirements (SRs) 3.8.1.2, 3.8.1.7, 3.8.1.10, 3.8.1.11, 3.8.1.14, and 3.8.1.17, by revising the steady-state voltage and frequency acceptance criteria for each emergency diesel generator (EDG).

The U.S. Nuclear Regulatory Commission (NRC) staff has determined the need for a regulatory audit to be conducted in accordance with Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ML19226A274), for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the LAR, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

2.0 REGULATORY AUDIT BASIS

The NRC staff (i.e., audit team) will perform the audit to support its evaluation of whether the licensee's request meets the requirements of section 50.36(c)(3), "Surveillance requirements," of Title 10 of the *Code of Federal Regulations* and continues to meet the plant-specific principal design criteria for electrical systems described in the Fermi 2 Updated Final Safety Analysis Report.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The audit team will review the licensee's analyses and calculations related to the steady state frequency and voltage acceptance criteria for EDGs specified in TS 3.8.1, SRs 3.8.1.2, 3.8.1.7, 3.8.1.10, 3.8.1.11, 3.8.1.14, and 3.8.1.17 to determine if the licensee needs to submit any additional information contained in the analyses and calculations performed in support of the requested change to support or develop conclusions for the NRC staff's safety evaluation.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

In the LAR, Enclosure 1, page 9, the licensee stated that Fermi 2 has been operating since 2013 under limiting condition for operation 2013-0293 to conform to EDG voltage and frequency values that are aligned with Design Calculation DC-6538 VOL 1 DCD 1, "EDG VOLTAGE AND FREQUENCY TOLERANCES." Also, on page 12 of the same enclosure, the licensee stated that the proposed changes tighten the allowable values and have been evaluated by design calculations associated with 4160 VAC/480 VAC supply to engineered safety feature loads using Electrical Transient and Analysis Program (ETAP) (DC-6447) and by EDG Voltage and Frequency Tolerances (DC-6538) for TS 3.8.1 analysis.

The NRC staff requests the licensee to have the following specific information readily available and accessible for the staff's review via an internet-based portal:

- Relevant portions of Design Calculations DC-6447 and DC-6538, used for deriving the revised values of EDG steady state voltage and frequency limits, proposed in the SRs.

Based on the review of the above documents, the NRC staff will determine whether it needs to request any additional documents to be made available on the portal or whether additional information needs to be submitted on the docket for the staff to complete the review of the requested changes.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- Vijay Goel, Team Leader and Electrical Engineer
- Nicholas Hansing, Mechanical Engineer
- Tristan Villarreal, Mechanical Engineer
- Surinder Arora, Project Manager

6.0 LOGISTICS

The audit will be conducted from March 6, 2023, to March 31, 2023, through an online portal (also known as electronic portal, ePortal, electronic reading room) established by DTE. The audit team's access to the online portal may be terminated after completion of the audit at a time established by the project manager.

If requested, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on the internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team may request that representatives of DTE answer the audit team's questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference or online meetings.

7.0 SPECIAL REQUESTS

The audit team would like access to the documents listed in section 4.0 above through an online portal that allows the audit team to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the audit team has access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff and contractors who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

Username and password information should be provided directly to the NRC staff. The NRC project manager will provide DTE the names and contact information of the NRC staff who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

An audit summary, which may be public, will be prepared within 60 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the NRC staff will issue requests for additional information to the licensee.

SUBJECT: FERMIL2 – AUDIT PLAN IN SUPPORT OF REVIEW OF LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS RELATING TO EMERGENCY DIESEL GENERATOR VOLTAGE AND FREQUENCY (EPID L-2022-LLA-0188) DATED FEBRUARY 24, 2023

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NAME	RKuntz (NSalgado for)	SArora		
DATE	02/24/2023	02/24/2023		

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