

Fermi 2
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Detroit Edison



January 26, 2000
NRC-00-0001

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, "Proposed Technical Specification Change (License Amendment) to Relax Surveillance Testing Requirements for Excess Flow Check Valves and Submittal of Pertinent IST Relief Request", NRC-99-0101, dated December 17, 1999
- 3) BWR Owners Group Letter to NRC, "BWR Owners Group Generic Response to NRC Request for Additional Information on Lead Plant Technical Specification Change Request Regarding Excess Flow Check Valve Surveillance Requirements", BWROG-00001, dated January 6, 2000

Subject: Additional Information Related to the Proposed Technical Specification Change to Relax Surveillance Testing Requirements for Excess Flow Check Valves (TAC No. MA7373)

In Reference 2, Detroit Edison proposed to amend the Fermi 2 Operating License NPF-43, Appendix A, Technical Specifications (TS) to modify TS Surveillance Requirement (SR) 3.6.1.3.9 to relax the SR frequency by allowing a representative sample of Excess Flow Check Valves (EFCVs) to be tested every 18 months, such that each EFCV will be tested at least once every ten years. The basis for this TS amendment is consistent with that described in the Boiling Water Reactor Owners' Group (BWROG) Report B21-00658-01, dated November 1998. This report was submitted to the NRC with Duane Arnold Energy Center (Docket No. 50-331)

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proposed TS amendment, as a lead BWR plant, on April 12, 1999. Generic responses to the NRC staff questions posed to the lead plant have been submitted by the BWROG to the NRC in Reference 3.

In Reference 2, Detroit Edison addressed plant-specific questions asked by the NRC staff of the lead plant; however, generic questions related to the BWROG Report B21-00658-01 were not specifically addressed. Detroit Edison has reviewed the responses provided by BWROG in Reference 3 and concludes that the responses are valid for the Fermi 2 plant. The BWROG response to question 5 calculates the release frequency initiated by an instrument line break for a plant with 94 instrument lines with two year surveillance intervals while Fermi 2 has 93 instrument lines and 18 month surveillance intervals; however, Detroit Edison has determined that the BWROG conclusion that releases would be infrequent remains applicable to Fermi 2.

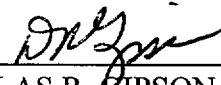
Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,



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

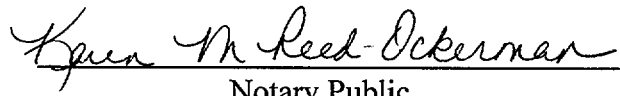
I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



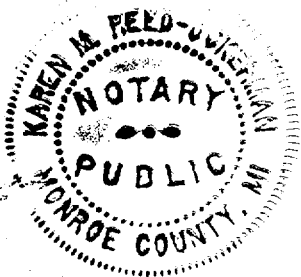
DOUGLAS R. GIPSON

Senior Vice President, Nuclear Generation

On this 26th day of January, 2000
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



KAREN M. REED-OCKERMAN
Notary Public, Monroe County, MI
My Commission Expires Sep. 2, 2003