

## PMFermiCOLPEm Resource

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**From:** Misenhimer, David  
**Sent:** Monday, August 04, 2014 3:56 PM  
**To:** FermiCOL Resource  
**Subject:** FW: DTE Supplemental Response to NRC RAI Letter No. 90 (NRC3-14-0011)  
**Attachments:** NRC3-14-0011.pdf

**From:** Norman K Peterson [<mailto:peteronn@dteenergy.com>]  
**Sent:** Monday, August 04, 2014 3:46 PM  
**To:** Govan, Tekia; Misenhimer, David; Muniz, Adrian; Umana, Jessica; Wilkins, Lynnea  
**Cc:** Michael K Brandon  
**Subject:** DTE Supplemental Response to NRC RAI Letter No. 90 (NRC3-14-0011)

Please see attached. Original sent to Document Control Desk via UPS. Tracking number is 1Z642A3R0190718814.

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**Subject:** FW: DTE Supplemental Response to NRC RAI Letter No. 90 (NRC3-14-0011)  
**Sent Date:** 8/4/2014 3:56:08 PM  
**Received Date:** 8/4/2014 3:56:11 PM  
**From:** Misenhimer, David

**Created By:** David.Misenhimer@nrc.gov

**Recipients:**  
"FermiCOL Resource" <FermiCOL.Resource@nrc.gov>  
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MESSAGE	482	8/4/2014 3:56:11 PM
NRC3-14-0011.pdf	1662436	

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

DTE Energy  
One Energy Plaza, Detroit, MI 48226-1279



10 CFR 52.79  
10 CFR 73.58

August 4, 2014  
NRC3-14-0011

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

References: 1) Fermi 3  
Docket No. 52-033  
2) Letter from Peter W. Smith (DTE Electric) to USNRC, "DTE Electric Company  
Response to NRC Request for Additional Information Letter Number 90,"  
NRC3-14-0007, dated July 2, 2014

Subject: DTE Electric Company Supplemental Response to NRC Request for  
Additional Information Letter Number 90

During a public teleconference on August 4, 2014, the NRC staff provided feedback to DTE Electric on its response to NRC Request for Addition Information (RAI) 13.06.01-57 provided in Reference 2. This RAI deals with the evaluation of plant changes relative to the Fermi 3 security and emergency preparedness programs during the plant design and construction period. Based on the discussions conducted during the August 4, 2014 teleconference, DTE Electric is providing a revised COLA markup associated with its response to RAI 13.06.01-57.

The revision to the Fermi 3 COLA markup is contained in the attachment to this letter. The proposed changes will be included in the next revision of the Fermi 3 COLA.

USNRC  
NRC3-14-0011  
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If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 4<sup>th</sup> day of August 2014.

Sincerely,



Peter W. Smith, Director  
Nuclear Development – Licensing and Engineering  
DTE Electric Company

Attachment: Markup of the Fermi 3 COLA

cc: Adrian Muniz, NRC Fermi 3 Project Manager  
Tekia Govan, NRC Fermi 3 Project Manager  
David Misenhimer, NRC Fermi 3 Project Manager  
Lynnea Wilkins, NRC Fermi 3 Project Manager  
Jessica Umana, NRC Fermi 3 Project Manager  
Sujata Goetz, NRC Fermi 3 Environmental Project Manager (w/o attachment)  
Mallecia Sutton, NRC Fermi 3 Environmental Project Manager (w/o attachment)  
Fermi 2 Resident Inspector (w/o attachment)  
NRC Region III Regional Administrator (w/o attachment)  
NRC Region II Regional Administrator (w/o attachment)  
Supervisor, Electric Operators, Michigan Public Service Commission (w/o attachment)  
Michigan Department of Natural Resources and Environment  
Radiological Protection Section (w/o attachment)  
Regina A. Borsh, Dominion Energy, Inc.  
Barry C. Bryant, Dominion Energy, Inc.  
Patricia L. Campbell, General Electric

**Attachment to  
NRC3-14-0011**  
(following 2 pages)

**Markup of the Fermi 3 COLA**

The following markup represents how DTE Electric intends to reflect this response in the next submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

**STD COL 13.6-18-A** Prior to the milestone for Physical Security Plan implementation (Table 13.4-201), the security plan will be updated with an analysis to determine if armed responders require ammunition greater than the amount normally carried to provide reasonable assurance of successful engagement of adversaries from various engagement positions, including the development of necessary procedures to assure adequate ammunition is available.

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**STD COL 13.6-19-A** Prior to the milestone for Physical Security Plan implementation (Table 13.4-201), the security plan will be updated with an analysis of the ESBWR Safeguards Assessment Report (DCD Reference 13.6-6) reflecting site-specific locations of engagement positions including fields of fire. This applies for the external Bullet Resisting Enclosures as well as any internal positions that have external engagement responsibilities. This will include an implementation analysis of the Security Strategy described in the report, focusing on the effectiveness of neutralization of adversaries before significant radiological sabotage can occur.

**STD COL 13.6-20-A** Features of the physical security system are covered, in part, by the standard ESBWR design, while other features are plant and site specific. Accordingly, the ESBWR standard ITAAC cover the physical plant security system and address those features that are part of the standard design. NRC guidance provides suggested ITAAC that cover both the standard design and the plant and site specific features. The plant and site-specific Physical Security ITAAC not covered by the ESBWR Tier 1, Section 2.19, are contained in Part 10, "ITAAC", Section 2.2.1 "Site-Specific Physical Security ITAAC."

**STD SUP-13.6-2** [START COM 13.6-002] Administrative procedures have been implemented that meet the requirements of 10 CFR 73.58 for managing the safety/security interface [END COM 13.6-002] ← Insert 1

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13.6.3 **COL Information**

13.6-6-A **Key Control**

**STD COL 13.6-6-A** This COL item is addressed in Subsection 13.6.1.1.5.

13.6-7-A **Redundancy and Equivalency of the CAS and Secondary Alarm Station**

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**Insert 1:**

These procedures are in effect at the time of issuance of the combined license and were developed using NRC endorsed industry guidance.