

## **NRR-DMPSPeM Resource**

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**From:** Goetz, Sujata  
**Sent:** Wednesday, May 9, 2018 9:50 AM  
**To:** Jason R Haas  
**Subject:** Request for Additional Information Regarding Fermi LAR to Adopt TSTF -542  
**Attachments:** TSTF-542 RAI number 2.docx

Dear Mr. Haas,

In a letter dated August 31, 2017, (Agencywide Documents Access and Management System Accession (ADAMS) No. ML17243A422), and as supplemented by your letter dated April 4, 2018 (ADAMS Accession No. ML18094A165) the DTE Electric Company submitted a license amendment request to adopt TSTF-542.

The LAR replaces existing technical specifications requirements related to operations with a potential for draining the reactor vessel with new requirements on reactor pressure vessel water inventory control to protect safety limit 2.1.1.3. Safety limit 2.1.1.3 requires reactor vessel water level to be greater than the top of active irradiated fuel.

The Nuclear Regulatory Commission staff has reviewed your submittals and has determined that additional information, as stated in the attachment to this email, is needed to complete its review.

Your response to the NRC is due by June 9, 2018.

**Sujata Goetz**  
**Project Manager, Fermi, Unit 2**

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**From:** Goetz, Sujata

**Created By:** Sujata.Goetz@nrc.gov

**Recipients:**  
"Jason R Haas" <haasj@dteenergy.com>  
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REQUEST FOR ADDITIONAL INFORMATION  
APPLICATION TO REVISE TECHNICAL SPECIFICATION TO ADOPT TSTF-542  
REVISION 2, "REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL"  
DTE ELECTRIC COMPANY  
FERMI 2

By application dated August 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17243A422), DTE Electric Company (DTE or the licensee), requested to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2, ML16074A448 which changes the technical specifications (TS) for Fermi 2. Your application was also supplemented by letter dated April 4, 2018 (ADAMS Accession No. ML18094A165).

**RAI EICB - 3**

In Enclosure 2 of the LAR, page 3.5-11, you proposed to adopt SR 3.5.2.9 (equivalent to TSTF-542 SR 3.5.2.8), which states, "Verify the required ECCS injection/spray subsystem actuates on a manual initiation signal."

In Enclosure 4 of the LAR, page 3.5.2-9, you provided the associated Bases for SR 3.5.2.9 (similar to TSTF-542 TS bases for SR 3.5.2.8), which states in part:

The required ECCS subsystem is required to actuate on a manual initiation signal. This Surveillance verifies that a manual initiation signal will cause the required CS [Core Spray] subsystems or LPCI [Low Pressure Coolant Injection] subsystem to start and operate as designed, including pump startup and actuation of all automatic valves to their required positions.

You stated in your letter dated April 4, 2018:

Fermi 2 does not have the capability to actuate an entire subsystem of CS or LPCI by a single manual pushbutton, as described in the response to RAI EICB-1. Instead, a CS or LPCI subsystem is actuated by manually controlling each individual component of that subsystem in accordance with approved plant procedures. In this context, the phrase "manual initiation channel" in the proposed TS Bases page B 3.3.5.3-3 is used to collectively describe all of the individual components required to manually initiate a subsystem and is not intended to imply that pushing one or two buttons actuates an entire subsystem.

Your design description does not align with the TSTF-542 standard technical specifications design description of manual initiation, which assumes that an entire ECCS subsystem can be started automatically with the press of one button. Adoption of language identical to the Standard Technical Specifications when there is a design difference could potentially cause confusion of the requirements. Conversely, in proposed Fermi 2 TS Table 3.3.5.3-1, functions 1.b and 2.b, the manual initiation for the CS and LPCI systems, respectively, each has a caveat; footnote (c) indicates that the manual initiation occurs through manipulation of individual component controls. (A similar footnote is found in current Fermi 2 TS table 3.3.5.1-1.)

Please revise SR 3.5.2.9, and any associated bases, to reflect the appropriate Fermi 2 ECCS manual initiation design requirements.