DTE Electric Company
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DTE

September 11, 2023
NRC-23-0064

10 CFR 50.90

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

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

Subject: Additional Supplemental Information to Exigent License Amendment Request for Technical Specification 3.7.2,"Emergency Equipment Cooling Water (EECW)/Emergency Equipment Service Water (EESW) System and Ultimate Heat Sink (UHS)"

References:

1) DTE Letter NRC-23-0050, "Exigent License Amendment Request for Technical Specification 3.7.2, Emergency Equipment Cooling Water (EECW)/Emergency Equipment Service Water (EESW) System and Ultimate Heat Sink (UHS)", dated August 10, 2023 (ML23222A037)

2) DTE Letter NRC-23-0059, "Response to Request for Additional Information Exigent License Amendment Request for Technical Specification 3.7.2, Emergency Equipment Cooling Water (EECW)/Emergency Equipment Service Water (EESW) System and Ultimate Heat Sink (UHS)", dated August 25, 2023 (ML23237B419)

3) DTE Letter NRC-23-0060, "Supplemental Information to Exigent License Amendment Request for Technical Specification 3.7.2, Emergency Equipment Cooling Water (EECW)/Emergency Equipment Service Water (EESW) System and Ultimate Heat Sink (UHS)", dated August 25, 2023 (ML23237B402)

In Reference 1, DTE Electric Company (DTE) submitted an Exigent License Amendment Request to revise the Fermi 2 Technical Specifications (TS). In Reference 2 DTE provided responses to NRC Requests for Additional Information (RAI). In reference 3 DTE submitted a Supplemental Information letter to correct a typo. This supplement to Reference 1 is provided to update the revision of Regulatory Guide 1.177 listed in Section 6.0 References from Revision 1 to Revision 2. Revision 2 of the Regulatory Guide was used in the PRA Technical Evaluation TE-E11-23-052, Enclosure 4 of Reference 1. This supplement also contains an update to section 2.3 of References 1 and 2. The description of the proposed change is revised to match the revised LCO 3.7.2 note which was provided in the Technical Specification mark-up and revised (clean) page in Reference 2. The Enclosure of this submittal letter contains the revised Sections 2.3 and 6.0.

The supplemental information does not impact the conclusions of the Regulatory Analysis, including the No Significant Hazards Consideration, documented in Reference 1.

No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact me at (734) 586-4772.

Sincerely,

Delegate for Manager - Nuclear Licensing per NANL-23-0007

Roxanne VonHabsburg

Eric Frank
Manager - Nuclear Licensing

Enclosure: Revised Sections 2.3 and 6.0

cc: NRC Project Manager
NRC Resident Office
Regional Administrator, Region III
Michigan Department of Environment, Great Lakes, and Energy

Enclosure to
NRC-23-0064

Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43

Revised Sections 2.3 and 6.0

EECW/EESW subsystems are separated from each other so that failure of one subsystem will not affect the OPERABILITY of the other subsystem.

The UHS is provided by a single highly reliable water supply in the form of the RHR reservoirs and a means of heat rejection in the form of mechanical draft cooling towers. The UHS consists of two one-half capacity reinforced concrete reservoirs each with a capacity of 3.41×10^6 gallons of water, corresponding to an elevation of 583 feet. The two reservoirs are connected by two redundant cross-tie lines to provide access to the combined inventory to either division of cooled equipment in the event of a failure in one of the divisions. Each RHR reservoir is the cooling source for that division's RHRSW subsystem, and EESW subsystem, as well as the diesel generator service water pumps for that division's emergency diesel generators (EDGs). A two-cell mechanical draft cooling tower is located over each division reservoir. Each cooling tower is designed to cool one division of supported equipment, thus providing full redundancy.

2.2 Circumstances Establishing Need for the Proposed Exigent Amendment

On July 18, 2023, at 0424 Eastern Daylight Time (EDT), the Division II Residual Heat Removal Service Water (RHRSW) Mechanical Draft Cooling Tower (MDCT) fan D tripped due to high vibrations caused by a degraded, non-conforming gearbox pedestal. Corrective actions were required to correct the conditions and restore the equipment to an operable status, using extra time allowed by the Notice of Enforcement Discretion (NOED) requested by our letter NRC-23-0049 and verbally approved by the NRC on July 20, 2023. During that time the UHS was declared inoperable. During the 'extent of condition' review, it was discovered that the MDCT A and C fan pedestals were also degraded and non-conforming, but remained Operable, and also in need of similar repair. This request is being made to be proactive and repair the Division I MDCT A and C fan pedestals. Additionally, this request provides justification that obtaining an extension of the Completion Time to repair the Division I MDCT fan pedestals online instead of waiting until the next refueling outage. The proposed amendment is being requested due to an exigent circumstance pursuant to 10 CFR 50.91(a)(6).

2.3 Description of the Proposed Change

The proposed license amendment would revise the LCO 3.7.2, Condition A Completion Time by adding the following footnote:

LCO 3.7.2

> * The 72-hour Completion Time is extended to 7 days one time for each of the Division I MDCT fan pedestals (A and C) to allow repair online during Cycle 22, regardless of whether maintenance is completed during the attempt. This proposed completion time extension and associated compensatory measures are documented in LAR NRC-23-0050. This completion time extension will expire at 2359 on November 19, 2023.

A marked-up copy of the proposed change is provided in Enclosure 2. Enclosure 3 provides revised (clean) pages.

6.0 REFERENCES

6.1 U.S. Nuclear Regulatory Commission, Regulatory Guide 1.177, Revision 2, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," January 2021 (ML20164A034)

6.2 U.S. Nuclear Regulatory Commission, Letter to Mr. Ken J. Peters, "Comanche Peak Nuclear Power Plant, Unit Nos. 1 And 2 - Issuance of Amendment Nos. 178 And 178 Regarding One-time Revision to Technical Specifications 3.7.8, "Station Service Water System (SSWS)," And 3.8.1, "AC Sources – Operating," February 12, 2021. (ML20324A627)

6.3 U.S. Nuclear Regulatory Commission, Letter to Mr. Christopher P. Domingos, "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Issuance of Amendment NOS. 237 and 225 Re: Inoperable Cooling Water Supply System Supply Header," November 23, 2021. (ML21281A017)

6.4 U.S. Nuclear Regulatory Commission, Letter to Mr. Brian H. Whitley, "Vogtle Electric Generating Plant, Unit 3 — Issuance of Amendment: Technical Specification Exceptions for In-containment Refueling Water Storage Tank Operability Prior to Initial Criticality" (Exigent Circumstances) February 8, 2023 (ML23031A359)

6.5 U.S. Nuclear Regulatory Commission, Letter to Mr. Peter Dietrich, "Notice of Enforcement Discretion (NOED) For Fermi Power Plant, Unit Two – Technical Specification 3.7.2, Emergency Equipment Cooling Water (EECW) / Emergency Equipment Service Water (EESW) System and Ultimate Heat Sink (UHS)," July 26, 2023 (ML23206A127)