

Joseph H. Plona
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10 CFR 50.54(f)

May 8, 2012
NRC-12-0032

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

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Letter, "Request For Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012

Subject: Detroit Edison's 60 Day Response to March 12, 2012 Information Request

On March 12, 2012, the NRC issued a letter entitled *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident*. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests within 90 days.

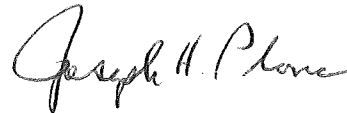
The letter states that if an addressee cannot meet the requested response date, then the addressee must provide a response within 60 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information, Detroit Edison proposes to take the alternative course of action described in Enclosure 1 of this letter. The basis of the proposal is explained in Enclosure 2.

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There are no regulatory commitments contained in this letter.

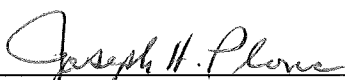
Should you have any questions or require additional information, please contact Mr. Kirk R. Snyder, Manager, Industry Interface at (734) 586-5020.

Sincerely,

A handwritten signature in cursive script, reading "Joseph H. Plone".

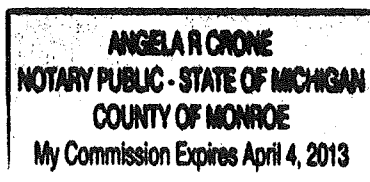
cc: Director, Office of Nuclear Reactor Regulation
NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, Joseph H. Plona, 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.



Joseph H. Plona
Site Vice President, Nuclear Generation

On this 8th day of May, 2012 before me personally appeared Joseph H. Plona, being first duly sworn and says that he executed the foregoing as his free act and deed.





Notary Public

Enclosure 1
Proposed Alternative Course of Action for
Responding to Recommendation 9.3 Information Request
Communications

Request #	Estimated Completion Date	Requested Information
1	10/31/2012	<p>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a larger scale natural event meeting the conditions described [<i>in the Discussion section of Reference 2, Enclosure 5</i>]. The assessment should:</p> <ul style="list-style-type: none"> • Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies, • Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies, • Provide a description an any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, • Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all AC power.
2	6/11/2012	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.
3	9/28/2012 10/31/2012	<p>Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.</p> <p>Conduct the communications assessment.</p> <p>Provide an implementation schedule of the time needed to implement the results of the communications assessment</p>

Staffing

Request #	Estimated Completion Date	Requested Information
1	<p>Only applicable to multi-unit sites</p> <p>Four months preceding the second refueling outage, as used in NRC Order EA-12-049 (Fermi 2 RF17 currently planned for the spring of 2015)</p>	<p>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described [<i>in the Discussion section of Reference 2, Enclosure 5</i>]. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</p> <ul style="list-style-type: none"> • How onsite staff will move back-up equipment (e.g., pumps, generators) form alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the NRC Near-Term Task Force (NTTF) Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1, such as plant operations and assessment of operational aspects, emergency directions and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate. • New staff or functions identified as a result of the assessment. • Collateral duties (personnel not being prevented from timely performance of their assigned functions). <p>Provide onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2 [Phase 1 staffing assessment].</p> <p>Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2 [Phase 2 staffing assessment].</p>

Request #	Estimated Completion Date	Requested Information
2	<p>Only applicable to multi-unit sites</p> <p>Five months preceding the second refueling outage, as used in NRC Order EA-12-049 (Fermi 2 RF17 currently planned for the spring of 2015)</p> <p>Only applicable to multi-unit sites</p> <p>Four months preceding the second refueling outage, as used in NRC Order EA-12-049 (Fermi 2 RF17 currently planned for the spring of 2015)</p>	<p>Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.</p> <p>1. Conduct the onsite and augmented staffing assessment:</p> <p>The onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2 [Phase 1 staffing assessment].</p> <p>The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2 [Phase 2 staffing assessment].</p> <p>2. A schedule of time needed to implement changes will be provided as follows:</p> <p>Those associated with the Phase 1 staffing assessment.</p> <p>Those associated with the Phase 2 staffing assessment.</p>
3	6/11/2012	Identify how the augmented staff would be notified given degraded communications capabilities.
4	6/11/2012	Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
5	6/11/2012	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

Request #	Estimated Completion Date	Requested Information
6	<p>Only applicable to multi-unit sites</p> <p>Four months preceding the second refueling outage, as used in NRC Order EA-12-049 (Fermi 2 RF17 currently planned for the spring of 2015)</p>	<p>Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.). Changes will be identified as follows:</p> <p>Those associated with the Phase 1 staffing assessment.</p> <p>Those associated with the Phase 2 staffing assessment.</p>

Enclosure 2

**Basis for Proposed Alternative Course of Action for
 Responding to EP Requested Information**

Communications

There are two separate responses to the information requests related to communications. The alternative timing of responses to requests #1 and #3 proposed in this letter reflects the higher priority placed by the staff, and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (*76 Fed. Reg. 72,560*). The proposed alternative timing is warranted as many of the licensee staff resources necessary for performing the communications assessment are the same resources involved in implementing new EP Rule requirements, responding to Institute of Nuclear Power Operations (INPO) initiatives related to enhancing communications capabilities (e.g., IER 11-4), and maintaining existing EP communications equipment.

In addition, the estimated completion date assigned to information request #3 will promote alignment between the out-year budgeting/funding of future enhancements, and the development of an accurate and complete enhancement implementation schedule.

Staffing

As presented in Enclosure 1 of this letter, a two-phase approach will be used to respond to the information requests associated with Staffing. The table below summarizes this approach.

Plant Type	Phase 1 Staffing Assessment (for functions except those related to NTTF Recommendation 4.2)	Phase 2 Staffing Assessment (for functions related to NTTF Recommendation 4.2)
Single-unit plants, including Fermi 2.	Perform staffing assessment and implement actions as required by the recent EP Rule using ISG and NEI 10-05	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per Enclosure 1 of the letter.
Multi-unit plants	<ul style="list-style-type: none"> • Perform the staffing assessment and implement actions as required by the recent EP Rule using ISG and NEI 10-05. • Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01 and material from NEI 10-05; provide results per Enclosure 1 of this letter 	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per Enclosure 1 of this letter.

The basis of this approach is discussed below:

- For multi-unit plants, the Phase 1 staffing assessment will be performed by March 29, 2013, and provided by April 30, 2013. This assessment will consider all requested functions except those related to Fukushima Near-Term Task Force (NTTF) Recommendation 4.2. An assessment considering these functions will be performed in Phase 2.

The timing of the Phase 1 staffing assessment reflects the higher priority placed by the staff and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (*76 Fed. Reg. 72,560*). In particular, Section IV.A.9 of 10 CFR 50, Appendix E, requires that licensees complete a detailed analysis demonstrating the on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan. As stated in the EP Rule, this analysis must be completed by December 24, 2012.

Following completion of EP Rule staffing analysis, the staffing assessment associated with the NRC letter will be performed. Based on staffing analysis experience to date, it is anticipated that a multi-unit staffing analysis will require approximately three months to complete and validate. One additional month is allotted for processing of an assessment submittal package.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 1 staffing assessment.

Single-unit plants, such as Fermi 2, do not need to provide a Phase 1 staffing assessment in response to the 50.54(f) letter as performance of this activity is governed by the recent EP Rule and existing license requirements.

- The Phase 2 staffing assessment will be conducted five months prior to the beginning of the second refueling outage as used in the context of NRC Order EA-12-049 (Fermi 2 RF17). This assessment will be provided four months prior to the beginning of the second refueling outage as used in the context of NRC Order EA-12-049 (Fermi 2 RF17). The assessment will consider the requested functions related to Fukushima Near-Term Task Force (NTTF) Recommendation 4.2.

The industry will be responding to multiple regulatory actions resulting from the recommendations contained in the Fukushima NTTF Report, as modified in related Commission Papers and Staff Requirements Memoranda. One of these actions, in particular, has the potential to impact emergency response staffing levels. This action is associated with Fukushima NTTF Recommendation 4.2 and subsequently issued as NRC Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for

Beyond-Design-Basis External Events EA-12-049 [the Order]. A summary of the Order is provided below

This Order requires a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core cooling, containment and spent fuel pool (SFP) cooling. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources brought from off-site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely.

Additional details on an acceptable approach for complying with this Order will be contained in the Interim Staff Guidance (ISG) scheduled to be issued by the NRC in August 2012.

In response to the Order, each licensee must develop new strategies for mitigating beyond-design-basis external events. To ensure accurate results, the staffing assessment for response functions related to NTTF Recommendation 4.2 must be based on the actions delineated in procedures and guidance developed in response to the Order. Once the site-specific actions associated with the new response strategies are defined (e.g., down to the procedure or guideline step level), the staffing needed to perform these actions can be assessed with the necessary level of accuracy.

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for the functions related to NTTF Recommendation 4.2 will be provided no later than 4 months prior to the beginning of the second refueling outage (as used within the context of NRC Order EA-12-049). For Fermi 2, this is refueling outage 17 currently planned for the spring of 2015.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 2 staffing assessment.

The Phase 2 staffing assessment is one component of an overall licensee work plan necessary to implement the requirements of the Order. Detroit Edison, as directed in the Order, "...shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." "Full implementation shall include procedures, guidance, training, and acquisition, staging or installing of equipment needed for the strategies."