J. Todd Conner Director, Nuclear Production

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10 CFR 2.202

October 19, 2012 NRC-12-0061

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 Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
- 3) NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
- 4) Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
- 5) NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

Subject:

Detroit Edison's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 2) to Detroit Edison. Reference 2 was immediately effective and directs Detroit Edison to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling

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capabilities in the event of a beyond-design-basis external event. Requirements are specified in Attachment 2 of Reference 2 and in Reference 3.

Reference 2 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 3) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 2 within 60 days following issuance of Reference 3. This report confirms that Detroit Edison has received Reference 3 and is in process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 2.

Major activities during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 3, as described in an NEI letter to the NRC (Reference 4).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 5).
- Resources are being identified and project plans are being initiated, including development of milestones, to assure compliance with Reference 2.

Planned activities for the next six months:

• Development and submittal of the overall integrated plan for implementation of the order.

Technical difficulties encountered that could affect the ability to provide the February 28, 2013 integrated plan submittal:

• None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule is being developed.
- Implementation of the order for Fermi 2 is required prior to startup from Refueling Outage 17 (currently scheduled for Fall 2015).

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This letter contains no new regulatory commitments.

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

Sincerely,

cc: Director, Office of Nuclear Reactor Regulation NRC Project Manager NRC Resident Office Reactor Projects Chief, Branch 4, Region III Regional Administrator, Region III Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC Mr. Eric E. Bowman, NRR/DPR/PGCB, NRC Supervisor, Electric Operators, Michigan Public Service Commission

I, James T. Connor, 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.

James)Т. Connor

Site Vice President, Nuclear Generation

On this \_\_\_\_\_\_day of October, 2012 before me personally appeared James T. Connor, being first duly sworn and says that he executed the foregoing as his free act and deed.

Mharon S. Marshall Notary Public

SHARON S. MARSHALL.
NOTARY PUBLIC, STATE OF MIS
COUNTY OF MONROE
MY COMMISSION EXPIRES JUN 14, 2013
ACTING IN COUNTY OF MONROE