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DTE Energy



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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

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

Subject: Notification of Deviation from Boiling Water
Reactor Vessel and Internals Project Guidelines

Detroit Edison Company is providing the U.S. Nuclear Regulatory Commission two Notifications of Deviation from the Boiling Water Reactor Vessel and Internals Project Guidelines. The deviations described in the enclosure are for BWRVIP-25 guidance for inspections on core plate bolting, and BWRVIP-41 guidance for inspections on jet pump diffuser/adaptor welds. This notification is provided for information only and no NRC action is being requested.

No regulatory commitments are contained in this letter.

Should you have any questions or require additional information, please contact Mr. Ronald W. Gaston of my staff at (734) 586-5197.

Sincerely,

A handwritten signature in black ink, appearing to read "W. J. Maratz".

Enclosure

cc: D. H. Jaffe
C. A. Lipa
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission
Randy Stark, BWRVIP

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Descriptions of Deviations from Boiling Water Reactor Vessel and Internals Project (BWRVIP) Guidelines

The BWRVIP program implementation guidelines provide guidance to ensure the consistent application of BWRVIP guidelines by member utilities. When Detroit Edison does not implement any portion of an applicable “mandatory” or “needed” BWRVIP guideline that has been approved by the BWRVIP Executive Committee, we will notify the NRC and BWRVIP within 45 days following our approval of the disposition of the deviation. BWRVIP-25 and BWR-41 deviations are detailed as deviations from “needed” guidelines.

BWRVIP Document	BWRVIP Requirement	Exception	Alternative In Lieu Of
BWRVIP-25 Core Plate Bolting	Ultrasonic Testing (UT) or Enhanced Visual Test (EVT-1) examination of the core plate rim hold-down bolts for all plants that have not installed core plate wedges by RF07 (4/2000).	EVT-1 inspections cannot be performed in the threaded area of the bolt. Tooling to perform UT examination of these bolts has not been developed. Visual Test (VT-3) examinations, which were performed, cannot be credited to verify the structural integrity of the bolts.	Tooling to perform the UT examination of these bolts has not been developed for the industry. The BWRVIP has completed a core plate bolt analysis project and has performed a plant specific analysis. The analysis concluded that inspection of the core plate bolts at Fermi 2 is not necessary.
BWRVIP-41 Jet Pump Welds	Inspect 50% of accessible high priority welds by RF07 (4/2000) with the remaining welds inspected by RF11 (4/2006). BWRVIP-41 identifies the DF-3, AD-1 and AD-2 welds as necessary for examination but recommends inspection when tooling is developed.	Modified Visual Test (MVT-1) and EVT-1 examinations were performed on all other Jet Pump Assembly welds. The Jet Pump diffuser/adaptor welds DF-3, AD-1 and AD-2 had not been inspected by either EVT-1 or UT examination prior to RF11.	During RF11 UT examination of 28% vs the recommended 50% of the diffuser/adaptor welds were completed. No indications of cracking were identified. The remaining welds are scheduled to be inspected before start-up from RF14 (10/2010).