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November 30, 1979

EF2 - 47174

Mr. S. A. Varga, Acting Assistant Director
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

- References:
1. Enrico Fermi Atomic Power Plant - Unit 2
NRC Docket No. 50-341
 2. General Electric Company Letter, "Mark I
Containment Program - NRC Acceptance Criteria
for the Mark I Long Term Program", November 30, 1979
 3. NRC Letter, "Acceptance for the Mark I Containment
Long Term Program", October 31, 1979
 4. Edison Letter, "Requirements for Additional Full-
Scale Test Facility Testing in Mark I Containment
Long Term Program", EF2-46703, October 25, 1979
 5. NRC Letter, "Confirmatory Requirements Relating
to Condensation Oscillation Loads for the Mark I
Containment Long Term Program", October 1, 1979

Subject: Requirements for Additional Full-Scale Test Facility
Testing and Schedule for Submittal of the Plant
Unique Analysis - Mark I Containment Long Term Program

In your letter of October 1, 1979 (Reference 5), we were notified that the Nuclear Regulatory Commission (NRC) will require additional large break, liquid blowdown confirmatory tests in the Full-Scale Test Facility (FSTF). The letter requested that Detroit Edison comment, on behalf of the Mark I Owners Group as a whole, to perform these tests and submit the test plan and schedule.

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We requested a delay (Reference 4) in our response to your October 1 letter until after the mid-November Mark I Owners Group meeting in which it was planned to discuss the subject of further FSTF testing.

Following the Owners Group meeting, the General Electric letter of November 30, 1979 (Reference 2) reported that the Mark I Owners Group has agreed to conduct a limited number of additional confirmatory full-scale tests in accordance with the request in Reference 5. The test plan and preliminary schedule for the tests were provided in the Reference 2 letter. Detroit Edison, as a member of the Mark I Owners Group, has concurred with the commitment of the Mark I Owners Group to conduct a limited number of additional confirmatory full-scale tests.

In your letter dated October 31, 1979 (Reference 3) you requested our schedule for the submittal of the Fermi 2 Containment Long Term Program (LTP) plant unique analysis.

In Amendment 12 (June 1978) to the Final Safety Analysis Report (FSAR), Article 3.8.2, we submitted an interim LTP plant unique analysis. Reference 17 to Article 3.8 described the program which was conducted to design and analyze structural modifications to the suppression chamber, vent system and suppression chamber internal structures. Modifications to the containment and associated structures were designed to accommodate the effects from the specified safety/relief valve discharge and pool swell dynamic loads. The results of the analyses were compared to the stress criteria developed as part of the Mark I Owners Group LTP. All items, as modified, meet the stress criteria of LTP for the specified loads, with consideration of some anticipated load reductions due to the initial LTP test data for other plants.

As part of our interim LTP plant unique analysis, we committed to the performance of a confirmatory review to verify the adequacy of the modified containment geometry for both stress and fatigue criteria after the issuance of the Mark I Containment Load Definition Report (LDR). The results of this confirmatory review were to be submitted in our final LTP plant unique analysis.

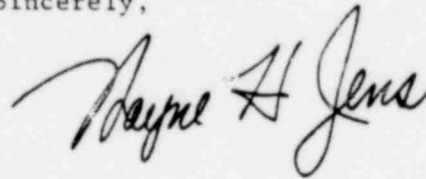
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The Mark I Containment Program LDR was issued in early 1979. The NRC staff review of the LDR was provided to Mark I Owners in the NRC acceptance criteria document attached to your October 31, 1979 letter (Reference 3). The NRC acceptance criteria revised numerous LDR load specifications. The Owners Group position (Reference 2) has been that the application of the NRC criteria is inconsistent with information presented by the Mark I Program and may result in a substantial impact on the structural evaluations and revision to current LTP implementation plans. The Reference 2 letter has identified several of the specific NRC criteria that are of major concern to the Mark I Owners.

Because our final LTP plant unique analysis depends in part on final resolution of all acceptance criteria, the schedule for submittal of our final plant unique analysis will be provided following final resolution between NRC and the Mark I Owners Group of the concerns identified in the Reference 2 letter.

Sincerely,



WHJ/DFL/LES/jl

cc: D. E. Howell
L. L. Kintner
J. F. Stolz

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