

**Detroit
Edison**

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EF2-47,357

Mr. G. Fiorelli, Chief
Reactor Construction and Engineering
Support Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Non-Compliance at Enrico Fermi
Unit II Construction Site

Dear Mr. Fiorelli:

This letter responds to the infraction contained in your IE Report 50-341/79-24. This inspection of Enrico Fermi Unit II Site Construction activities was performed by Messrs. F. J. Jablonski and J. Hughes on November 27-29, 1979.

Only the cited infraction mentioned in your report is discussed in this reply, as required by Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. The unresolved items are being acted upon. We will be prepared to report in detail on our progress and corrective action on this matter to your inspectors on their next visit.

The enclosed response is arranged to the sequence of items cited in the body of your report. The finding and section numbers are referenced.

We trust this letter satisfactorily answers the concerns raised in your report. We shall be glad to discuss any further concerns you may have.

Sincerely yours,

Edward Hines

EH/HAW/lm
Enclosure

cc: Mr. John G. Davis
Acting Director
Office of Inspection and Enforcement
Division of Reactor Inspection Programs
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

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THE DETROIT EDISON COMPANY
QUALITY ASSURANCE DEPARTMENT
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/79-24

Docket No. 50-341 License No. CPPR-87

Inspection at: Fermi II Site, Monroe, Michigan

Inspection conducted: November 27-29, 1979

Prepared by:

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Site Project QA Engineer

Approved by:

R. W. Barr

R. W. Barr
Project QA Director
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Statement of Infraction 79-24, Appendix A

Infraction: Contrary to 10CFR50, Appendix B, Criterion III; Enrico Fermi 2 QA Manual, QAP No. 3 subparagraph 3.1.3.3; and 10CFR50, Appendix A, Criterion IV, "the licensee failed to review the suitability of stem mounted limit switches located on the Main Steam Isolation Valves (MSIV). The switches are used to provide operator information read-out and initiate protective action signals."

Corrective Action Taken and Results Achieved

The main steam isolation valve limit switches provide two basic functions:

- 1) Control room indication of the valve position, and
- 2) Sensing logic for an anticipatory scram of the reactor when three of the four steam lines are closed.

A post-LOCA environmental qualification of these switches is not required since the position indication is not a safety function and the reactor trip input is not required to function subsequent to a LOCA event. In the case of a LOCA, the MSIV closure would not be the primary scram input since reactor level and/or drywell pressure would precede the actual isolation valve closure signals.

In addition, a complete failure of the MSIV limit switches following a spurious MSIV closure would not result in overpressure and/or fuel damage due to the timely operation of the flux or pressure scrams. This analysis is contained in Appendix 5A of the FSAR.

General Electric has verified that the switch qualification exceeds that expected during normal operation; the junction box and hookup wire furnished with the MSIV's have been tested for the following steam environment profile:

First 3 hrs.	103 psig & 340 ^o F
Next 3 hrs.	75 psig & 320 ^o F
Next 16 hrs.	16 psig & 250 ^o F

It was found that the switch functioned normally at the beginning, during and the end of each test period.

Corrective Action to be Taken to Avoid Further Non-Compliance

Vendor Document Packages (VDP's) are prepared for safety related systems. As a part of a VDP, all the components performing safety functions are

Corrective Action to be Taken to Avoid Further Non-Compliance (cont'd)

identified and adequacy of environmental qualification documentation as applicable for these components is verified. This is properly recorded in the VDP by indicating storage location and file number of the documents for easy retrieval.

We have followed the policy of qualifying our electrical equipment to the standard in effect at the time of purchase. Regulatory Guide 1.89 mentioned in the IE Circular 78-08 applies in its implementation section only to equipment purchased after November 15, 1974. Fermi 2 has followed this requirement for all new purchase orders dated November 15, 1974, or later. However, as equipment deficiencies or failure modes come to light, studies are initiated to evaluate their impact on Fermi 2 installation. Corrective action is then taken if required.

Date When Full Compliance Will be Achieved

It is Detroit Edison's position that the Fermi 2 Project is within full compliance on the requirements for the subject limit switches.

Documentation for safety-related equipment furnished by the NSSS supplier, General Electric, is maintained at their facilities and verified by Edison by audit. The Main Steam Isolation Valves are part of the General Electric supply. Items identified in FSAR section 3.11 and supplied by General Electric will be audited by March 30, 1980. We will advise you of the audit dates when arrangements have been finalized.