Detroit

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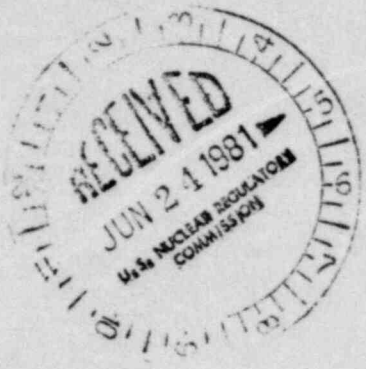
June 23, 1981

EF2 - 53859



Mr. L. L. Kintner
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Kintner:

Reference: Enrico Fermi Atomic Power Plant, Unit 2
NRC Docket No. 50-341

Subject: Further Explanation for Exercising Plan for Pressure Isolation Valves

Our letter on Inservice Inspection of Pressure Isolation Valves, EF2-52674, June 2, 1981 states:

"These valves shall not be routinely exercised every three months during plant operation as required by IWV-3410 because:

1. Such tests remove one of the two barriers protecting the low pressure portion of the emergency core cooling systems.

2. The operators on testable check valves cannot overcome the force on the valve with reactor pressure on one side."

The following is in response to a request from Mr. Anthony Cappucci, NRC, to Detroit Edison to supply additional justification for this exercise program.

A routine test every three months as described in IWV-3410 presupposes the test can be done with the plant operating at full power (and pressure). The purpose of dual barriers is to provide pressure isolation and protection even if one of the barriers should be faulty. Should one of the barriers be faulty by being inoperable, the core cooling systems have sufficient redundancy to perform their function. In addition, an inoperable barrier would be found during the proposed tests made at cold shutdown.

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However, should one of the barriers be faulty by having excessive leakage, the core cooling system connected to that barrier could be severely damaged. Therefore, the test could cause a significant loss of primary coolant. On the other hand, had the test not been performed for this latter case, the core cooling system would have performed its function normally

We believe these arguments provide the sufficient justification for performing tests on pressure isolation valves only during cold shutdown periods and form the basis for our request for relief from the Code testing schedule.

Sincerely,

W F Colbert

W. F. Colbert
Technical Director
Enrico Fermi 2 .

WFC/MLB/dk