

NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

January 11, 1990

Docket No. 50-341

Mr. B. Ralph Sylvia
Senior Vice President - Nuclear
Operations
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

Dear Mr. Sylvia:

SUBJECT: CONTROL ROOM EMERGENCY FILTRATION SYSTEM, LICENSE CONDITION

2.C.(7) (TAC NOS. 59610 AND 75081)

License Condition 2.C.(7) of Facility Operating License No. NPF-43 for the Fermi-2 facility states:

Prior to startup following the first refueling outage, DECo shall provide assurance to the NRC staif that potential contamination pathways through those portions of the control room air-conditioning system which are external to the control room zone will not have a significant adverse impact on control room habitability, or will propose a technical specification which provides for periodic leakage testing to assure the integrity of those external portions of the control room air-conditioning system.

The basis for the License Condition is discussed in NUREF-0798, Supplements 5 and 6, "Safety Evaluation Related to the Operation of Fermi-2," March and July 1985. Supplement 5 to the Fermi-2 Safety Evaluation Report, Section 6.4.1 discusses the basis for the NRC acceptance of the design of the Control Room Emergency Filtration System (CREFS). The staff was concerned, due to the use of silicone sealant on portions of the ductwork external to the control room, whether the ductwork would remain sufficiently leak tight and continue to adequately minimize unfiltered inleakage over the 40 year life of the plant. Therefore, the staff included License Condition 2.C.(7) to the Fermi-2 license which incorporates the licensee's commitment on this matter.

By letter dated September 27, 1989, Detroit Edison Company (DECo) informed the MRC of its plan for meeting License Condition 2.C.(7).

The licensee originally had planned to replace the existing ductwork with ductwork of welded construction in accordance with Regulatory Guide 1.52. However, the determination was made that little benefit to the sealing characteristics would be gained by replacement of the ductwork, since the existing ductwork already has welded seams.

DEO!

The licensee's plan is revised as follows:

Certain changes will be made to the existing design to improve the sealing characteristics of the portion of ductwork outside of the control room. The licensee will test the portion of the ductwork external to the control room which will experience negative pressure to ensure infiltration criteria are met during the first refueling outage. An appropriate periodic test interval will be established. The pressure decay increase method will be used for the test.

By letter dated November 3, 1989, DECo provided the test results taken during the current refueling outage as required by License Condition 2.C.(7). By letter dated November 16, 1989, the licensee submitted a proposed change to the Fermi-2 Technical Specifications to provide surveillance requirements for periodic leakage testing and visual inspection of the CREFS to assure the integrity of those portions of the system external to the Control Room as required by License Condition 2.C.(7).

Based on the staff review of the documents submitted by DECo, the staff finds that the requirement of License Condition 2.C.(7) has been satisfied. The staff's detailed analysis of the November 3, 1989, test results and the hovember 16, 1989, proposed Technical Specification change will be transmitted under a separate cover. This completes the staff's action on TAC Nos. 59610 and 75081.

Sincerely.

Cristical signed by

John F. Stang, Project Marager Project Directorate III-1 Division of Reactor Projects - III, IV, V & Special Projects Office of Nuclear Reactor Regulation

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Sincerely.

John F. Stang, Project Manager Project Directorate 111-1 Division of Reactor Projects - III, IV, V & Special Projects Office of Nuclear Reactor Regulation

cc: See next page

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