



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

EVALUATION OF NRC GENERIC LETTER 88-01 RESPONSE

DETROIT EDISON COMPANY

WOLVERINE POWER SUPPLY COOPERATIVE, INCORPORATED

FERMI, UNIT 2

DOCKET NO. 50-341

1.0 INTRODUCTION

Detroit Edison Company, the licensee, submitted its response to NRC Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping" for Fermi, Unit 2 by letters dated August 5, 1988, and April 27, 1989. Additional information as requested by the staff was provided by letter dated May 12, 1989. Generic Letter 88-01 requested licensees and construction permit holders to resolve the IGSCC issues for BWR piping made of austenitic stainless steel that is 4 inches or larger in nominal diameter and contains reactor coolant at a temperature above 200 degrees Fahrenheit during power operation regardless of Code classification. The licensee was requested to address the following:

1. The current plans regarding pipe replacement and/or other measures taken to mitigate IGSCC and provide assurance of continued long term integrity and reliability.
2. The licensee should commit that the Inservice Inspection (ISI) Program to be implemented at the next refueling outage will include piping covered by the scope of GL 88-01 and will be in conformance with staff positions on schedule, methods and personnel, and sample expansion included in GL 88-01.
3. The Technical Specifications (TS) should be changed to include a statement in the section on ISI that the ISI Program for piping covered by the scope of this letter will be in accordance with NRC staff positions on schedule, methods and personnel, and sample expansion included in GL 88-01. (See model BWR Standard TS enclosed in GL 88-01.) It is recognized that the Inservice Inspection and Testing sections may be removed from the TS Improvement programs. In this case, this requirement shall remain with the ISI section when it is included in an alternative document.
4. Confirmation of the licensee's plans to ensure that the TS related to leakage detection will be in conformance with the staff position on leak detection included in GL 88-01.

5. The licensee's plans to notify the NRC in accordance with 10 CFR 50.55a(g) of any flaws identified that do not meet IWB-3500 criteria of Section XI of the Code for continued operation without evaluation, or a change found in the condition of the welds previously known to be cracked, and your evaluation of the flaws for continued operation and/or your repair plans.

2.0 DISCUSSION

The licensee's response to NRC GL 88-01 has been reviewed by the staff with the assistance of its contractor, Viking Systems International (VSI). As a result of this review, only one open issue remains. The licensee's position concerning leakage limits in the current Fermi-2 TS is less conservative than what is provided in NRC GL 88-01, is not adequately justified, and is therefore unacceptable. The Fermi-2 TS requires plant shutdown when the increase in unidentified leakage exceeds 2 gpm over a four-hour period rather than a 24-hour period as required by GL 88-01.

3.0 CONCLUSION

Based on the review of the licensee's NRC GL 88-01 response, the staff concludes that the response as evaluated is acceptable with the exception of the licensee's position concerning leakage limits. Staff recommends that the licensee propose a change to the Fermi-2 TS for determining an increase of 2 gpm leakage from 4 to 24 hours in accordance with GL 88-01. The staff also concludes that the proposed IGSCC inspection and mitigation program will provide reasonable assurance of maintaining the long-term structural integrity of austenitic stainless steel piping in the Fermi-2, BWR Nuclear Power Plant.

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