

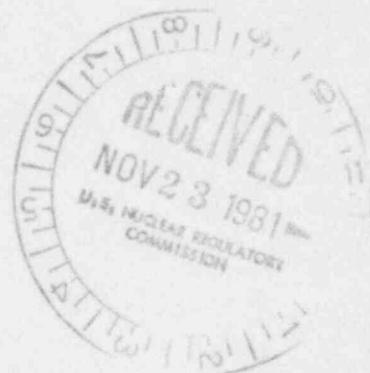
**Detroit
Edison**

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November 18, 1981
EF2 - 55,512

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Eisenhut:

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

Subject: NUREG-0798 Open Items

Section 6.2.7 in Supplement 1 of the Fermi 2 SER (NUREG-0798), identifies two outstanding open items to be resolved.

1. Traversing Incore Probe System Testing

Edison agrees to expand the Fermi 2 Technical Specifications to include provisions to:

- a. Verify the continuity of the explosive charge at least once every 31 days.
- b. Initiate one of the explosive squibs charge at least once every 18 months. The replacement charge for the explosive valve shall be from the same manufactured batch as the one fired or from another batch which has been certified by having one of that batch successfully fired.
- c. Replace all charges according to the manufacturer's recommended lifetime.

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2. Bypass Leakage Testing of HPCI-and RCIC systems

a. Steam Drain Lines

Our investigation has shown that incorporation of the modifications required in the SER Supplement 1 on HPCI and RCIC steam line drains will jeopardize restart capability of these systems. Consequently, Edison withdraws our proposal to designate only the actual bypass path and its accompanying valves as being part of the bypass leakage test program and, instead, agrees to designate the respective penetrations as the bypass paths. The HPCI and RCIC penetrations are tested according to the Type C (Appendix J) provisions, as are all other primary containment penetrations.

b. Discharge to Condensate Storage Lines

The line to condensate storage from the RCIC System meets all the requirements listed in SER Supplement 1.

The HPCI system by design criteria has all valves powered from Division 2. Consequently, the requirement to supply the two valves in the condensate storage line with divisional power cannot be met. (All other requirements are met). The following plan is suggested to overcome this dilemma:

The path from the primary coolant pressure boundary to the condensate storage tank contains not two but three valves: V8-2194, V8-2198, V8-2200. These valves are interlocked such that V8-2194 must be closed before V8-2198 can be opened. Consequently adding V8-2194 to the list of valves tested for bypass leakage would provide assurance that leakage criteria would not be exceeded even for the case of loss of Division 2 power while V8-2198 is open.

Edison believes this meets NRR criteria for bypass leakage paths.

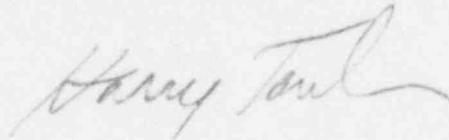
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c. Revised List of Valves for Bypass Leakage Testing

The list of valves for bypass leakage testing was given previously in our letter EF2-53,932, July 2, 1981. Based on the changes discussed above, the list becomes:

<u>SYSTEM</u>	<u>P&ID</u>	<u>VALVE</u>
Steam Line Drain	6M721-2089	V17-2009 V17-2010
HPCI	6M721-2035	V8 -2194 V8 -2198 V8 -2200 V17-2020 V17-2021 V17-2088
RCIC	6M721-2044	V8 -2232 V17-2030 V17-2031
Drywell Sumps	6M721-2032	V9 -2044 V9 -2005 V9 -2022 V9 -2023

Sincerely,



cc: Mr. L. L. Kintner
Mr. B. Little