Harry Tauber Vice President



2000 Second Avenue Detroit, Michigan 48226 (313) 237-8000

> September 3, 1982 EF2 - 59,069

Mr. B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Youngblood:

- Reference: Enrico Fermi Atomic Power Plant, Unit 2 NRC Docket No. 50-341
- Subject: Criteria for Document Storage Vault Clarification on ANSI N45.2.9 - 1974

Detroit Edison is in the process of constructing its secure record storage facility in the new Nuclear Operations Center at the Fermi 2 site. While Nuclear Operations has elected to adopt the "dual storage" facility option provided by ANSI N42, since most of our documentation will be stored on multi-copy microform, unfilmable materials will reside in this area.

We have committed in the FSAR (Chapter 17, paragraph 17.2.17) that this storage facility must be built in accordance with the standards set by ANSI N45.2.9-1974. However, a careful review and analysis of these standards, if literally interpreted, suggests that light, power, and communications cable penetrations are prohibited. Since this posture seems extreme, we contacted Mr. Les Kintner and Mr. John Gilray of your organization for clarification.

Mr. Gilray was sympathetic with our position and suggested we talk with the administrator of a recently constructed, and NRC accepted, storage facility. We did so, and found that Northeast Utilities' vault does, in fact, have light, power, and communications penetrations. Accordingly, it is our intention to proceed in a similar fashion.

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If the above is not acceptable, we request that you inform us as soon as possible so that we may resolve any comments you may have since construction of the Nuclear Operations Center has begun.

> Sincerely, C.M. Heidel for H. Taubu

cc: Mr. J. W. Gilray Mr. L. L. Kintner Mr. B. Little