

Harry Tauber
Vice President
Engineering and Construction

**Detroit
Edison**

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

October 11, 1982
EF2 - 59,304

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

Dear Mr. Kintner:

- References: (1) Enrico Fermi Atomic Power Plant, Unit 2
NRC Docket No. 50-341
- (2) Letter Detroit Edison to NRC,
"Inservice Inspection of Pressure
Isolation Valves", EF2-52,674,
June 3, 1981

Subject: Inservice Inspection of
Pressure Isolation Valves

The Reference 2 letter provided justification for taking exception to leak testing every time a valve is moved from its fully closed position on the basis that, among other things, full closure is verified in the control room by direct monitoring, including check valves. This position was accepted in Section 3.9.6.2 of the Fermi 2 Safety Evaluation Report.

Further clarification is required with reference to check valves. Direct monitoring is included for the block and check valves listed in Reference 2 with the exception of HPCI and RCIC system check valves (E41-F005 and E51-F009). Reviewing the configuration for these systems, Detroit Edison has decided to modify the designation of the pressure isolation valves. In addition to check valve E41-F005, gate valve E41-F007 will also serve as an outside pressure isolation valve on the HPCI system. Likewise, on the RCIC system gate valve, E51-F012 will supplement check valve E51-F009. The inservice inspection program will be modified to delete the check valves and add the specified gate valves for category Type A testing. The normal operating configuration will remain the same,

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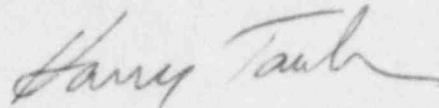
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i.e. valves E41-F007 and E51-F012 open. However, if excessive leakage occurs through the normally closed gate and check valves, the operator will be alerted to the fact by an alarm in the control room of high pressure on the suction side. Operating procedures will require shutting the normally open pressure isolation valve. Position of these valves is indicated in the control room.

These design features provide better protection than check valve position monitoring for these two systems. This clarification will be factored into the FSAR in a forthcoming amendment.

Should you have any further questions, please contact Mr. L. E. Schuerman (313-649-7562).

Sincerely,



cc: B. Little