

Detroit
Edison

William S. Orser
Senior Vice President

Fermi 2
5400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5201



Nuclear
Operations

December 10, 1990
NRC-90-C180

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) NRC Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance", and Supplements 1 & 2, dated June 28, 1989; June 13, 1990; and August 3, 1990, respectively.
 - 3) Detroit Edison Letter to NRC, "Response to NRC Generic Letter 89-10", NRC-89-0274, dated December 28, 1989
 - 4) NRC Information Notice 90-40, "Results of NRC-Sponsored Tests of Motor-Operated Valves", dated June 5, 1990
 - 5) NRC Generic Letter 89-10, Supplement 3, "Consideration of the Results of NRC-Sponsored Tests of Motor-Operated Valves", dated October 25, 1990

Subject: Response to NRC Generic Letter 89-10, Supplement 3

Detroit Edison has reviewed the Supplement 3 to Generic Letter 89-10 (Reference 5) which was received on November 9, 1990. This Generic Letter supplement requested us to assess the applicability of the data from the NRC-sponsored MOV tests, to perform a plant-specific safety assessment to verify that the generic safety assessments performed by the NRC staff and the BWR Owners' Group (BWROG) and provided as Enclosures 1 & 2 to this supplement are applicable, and to take various other specific actions.

This supplement requires notification to the NRC within 30 days that a plant specific safety assessment report is available on site, and whether there are MOVs with deficiencies of greater safety significance than those specified in the supplement. It also requires, that certain specific information should be provided to the

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NRC within 120 days regarding any existing deficiencies in the MOVs discussed in the supplement, including their identification, and a schedule for any necessary corrective actions. This letter is to provide the 30-day response to the supplement; the 120-day response will be provided to the NRC by March 8, 1991.

In response to Supplement 3 to Generic Letter 89-10, Detroit Edison has prepared a Plant-Specific Safety Assessment Report to verify that the generic safety assessments performed by the NRC staff and the BWROG are applicable to Fermi 2. The Fermi 2 Plant-Specific Safety Assessment Report is available on site for NRC review.

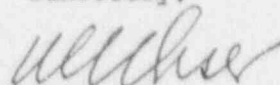
For applicability of NRC staff generic safety assessment, the Fermi 2 Plant-Specific Safety Assessment Report provides detailed discussion of NRC items and concluded that the generic assessment related to HPCI and RCIC Low Erosion/Corrosion Susceptibility, Piping Stress Levels, Failure Mechanisms, Margin on Assumed Differential Pressure, Consequence Mitigation, and Risk Probability Analysis is applicable to Fermi 2. For the remaining items - RWCU Augmented Inspections, Valve Redundancy, and Closure After Depressurization - due to plant physical differences, the Fermi 2 report has provided plant-specific discussions and concluded that overall the generic safety assessment is valid for Fermi 2, and justifies continued safe operation of the plant.

For applicability of BWROG generic safety assessment, the Fermi 2 Plant-Specific Safety Assessment Report has provided detailed plant-specific discussions of the BWROG report items and concluded that overall the generic safety assessment is valid for Fermi 2, and justifies continued safe operation of the plant, though some plant specific differences exist.

The Fermi 2 Plant-Specific Safety Assessment Report has also determined that there are no MOVs at Fermi 2 with deficiencies of greater safety significance than those specified in Supplement 3 to Generic Letter 89-10.

If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



cc: A. B. Davis
R. W. DeFayette
W. G. Rogers
J. F. Stang

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I, WILLIAM S. ORSER, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

William S. Orser

WILLIAM S. ORSER
Senior Vice President

On this 10th day of December, 1990, before me personally appeared William S. Orser, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosalie A. Armetta
Notary Public

ROSALIE A. ARMETTA
Notary Public, Monroe County, MI
My Commission Expires Jan. 11, 1992