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October 22, 1982  
EF2-59401

Mr. James G. Keppler, Regional Administrator  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Final Report of 10CFR50.55(e) Item on Pipe Support Snubber Design  
Deficiency (#69)

Dear Mr. Keppler:

This is Detroit Edison's final report on the pipe support snubber design deficiency. This problem was originally reported to Mr. H. Wescott of NRC Region III by Detroit Edison's Mr. H.A. Walker, Supervisor-Construction Quality Assurance, on May 27, 1982.

During an NRC inspection, Mr. I.T. Yin of the NRC noted a number of locations where snubbers were to be installed where their functional ability would be impaired. In some instances, the movement was not sufficient to allow the snubber to lock-up, transferring the snubber load to adjacent rigid supports causing possible over-stress. This is a potential safety problem.

A stop work order was issued on May 25, 1982, for all snubber related construction activities. Based on discussions and agreements between Mr. Yin and members of Edison's Engineering staff, the stop work order would not be lifted until a formal "Snubber Reduction Program" was issued for Fermi 2 by Edison, and that program was reviewed and accepted by Mr. Yin. On June 4, 1982, Detroit Edison submitted a proposed "Snubber Reduction Program" to Mr. James G. Keppler. Based upon a June 7, 1982, telephone conversation between Mr. Yin and our Mr. J.G. Casiglia, Edison was informed that Mr. Yin had reviewed the proposed program and found it acceptable. On June 8, 1982, Detroit Edison submitted a final record copy of the "Snubber Reduction Program" to Mr. Keppler.

With the acceptance of the "Snubber Reduction Program", Edison proceeded to lift the stop work order and resume snubber construction in an orderly and controlled fashion. To date, the major activities relative to the implementation of this program consist of the following:

- o In accordance with the "Snubber Reduction Program", on June 9, 1982, the stop work order was lifted for the majority of the snubbers on 2 inch and smaller ASME Class 2 and 3 lines that were analyzed by generic methods.

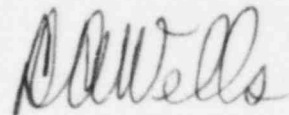
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- o On July 12, 1982, the stop work order was lifted for approximately 160 snubbers on large bore piping systems which must be installed as per the criteria of the "Snubber Reduction Programs".
- o In order to complement construction activities, snubbers located near the RHR Pumps and the Core Spray Pumps were evaluated in accordance with the "Snubber Reduction Program". As a result of that evaluation, 28 snubbers are scheduled to be replaced with rigid struts and 4 snubbers will be cancelled.
- o Implementation of the "Snubber Reduction Program" is continuing at Edison. The necessary activities are being coordinated with construction activities and Edison's Piping Stress Reconciliation Programs. In accordance with Mr. Yin's request, Edison will provide a comparison between the number of all suspension components originally required and the number actually required after the snubber reduction program is completed. This data will be included in the documentation that will be forwarded to the NRC when the program is completed.

Project Design is confident that the "Snubber Reduction Program" currently being carried out will identify any snubbers that are unnecessary from a thermal expansion viewpoint and will also resolve the issue of dynamic actuation of snubbers. Project Design estimates that full compliance with the "Snubber Reduction Program" will be achieved prior to fuel load.

If you have questions concerning this matter, please contact Mr. G.M. Trahey, Assistant Director-Project Quality Assurance.

Very truly yours,



DAW/DF/cp

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