

Detroit
Edison

Stanley G. Catola
Vice President
Nuclear Engineering and Services

Fermi 2
6940 North Dixie Highway
Livonia, Michigan 48150
(313) 585-4000



July 31, 1991
NRC-91-0100

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) Detroit Edison letter to NRC, NRC-90-0057,
dated March 26, 1990

Subject: Withdrawal of Proposed Technical Specification
Change - Snubbers (TAC No. 77684)

In accordance with 10CFR2.107, Detroit Edison hereby requests that the Reference 2 Operating License Amendment application be withdrawn. The Reference 2 application proposed to change Technical Specification (TS) 4.7.5.c which concerns snubber visual inspection requirements.

TS 4.7.5.b currently requires that changes be made to snubber visual inspection intervals based upon previous inspection results and TS 4.7.5.c includes an allowance for excepting visual inspection failures from the requirement to reduce inspection intervals. A visual inspection failure need not be considered a failure for determining the subsequent interval provided the cause of the failure is established and remedied, and the snubber was determined to be operable when functionally tested in the as-found condition.

Detroit Edison proposed to change TS 4.7.5.c to allow this exception if either of the two criteria were satisfied. This would eliminate mid-cycle shutdowns to perform visual inspections due to previous visual inspection failures which either were adequately corrected or were determined to have not actually impacted the snubber's operability.

In a telephone conference on July 22, 1991, the NRC staff indicated that the current TS requirement to reduce the surveillance interval provides the benefit of requiring an earlier confirmation of the satisfactory resolution of visual inspection failures. It was agreed that there may be circumstances where a plant shutdown may not be necessary nor desirable solely for the purpose of visual inspection.

9108060158 910731
PDR ADOCK 05000341
P PDR

A047
1/0

USNRC
July 31, 1991
NRC-91-0100
Page 2

However, the staff indicated that these cases should be addressed individually when and if they occur.

Detroit Edison agrees that these cases can be addressed individually and is therefore requesting that the proposed change be withdrawn.

If you have any questions concerning this request, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,

A. Katola

cc: A. B. Davis
R. W. DeFayette
J. F. Stang
S. Stasek