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> September 15, 1983 EF2 - 65,232

Director of Nuclear Reactor Regulation Attention: 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: (1) Enrico Fermi Atomic Power Plant, Unit 2 NRC Docket No. 50-341

(2) Detroit Edison Letter to NRC, EF2 - 53,454, June 4, 1981

Subject: Clarification on SRV Maintenance Interval

The reference (2) Detroit Edison letter to the NRC and section 5.2.2 of the Fermi 2 SER (p. 5-11) discuss a two year maintenance period for Main Steam Safety/Relief Valves (SRV's). Closer scrutiny of this commitment indicates that a clarification is required. The commitment as stated is impractical from a plant operation, maintenance standpoint, and is inconsistent with current industry practices and NRC positions. Accordingly, Detroit Edison intends to do the following in this regard:

- 50% of the SRV's will be removed from service and tested and serviced at any given refueling outage (nominally 18 months).
- 2) The remaining 50% will be tested during the subsequent refueling outage.

The testing program is in conformance with Section XI of the ASME Code as stated in section 5.2.2.4.1.3 of the Fermi 2 FSAR. The maintenance performed on the valves is that maintenance or servicing of the valve to correct or prevent abnormal or unsatisfactory SRV operation.

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The above position is consistent with current industry practice and is consistent with the NRC Safety Evaluation Report of the BWR Owners Group Response to Item II.K.3.16 of NUREG-0737. The Fermi 2 FSAR will be modified in a forthcoming amendment to remove any ambiguity or confusion. It should also be noted that we are working closely with the BWR Owners Group on the recent hypothesized binding/sticking problem which resulted in a delayed SRV actuation. We will plan to modify our testing and/or maintenance program appropriately, consistent with the group's recommendations.

If you should have any questions, please contact Mr. Larry E. Schuerman on (313) 586-4207.

Sincerely, Jaul

cc: Mr. P. Byron

Mr. M. D. Lynch