



Wayne H. Jens  
Vice President  
Nuclear Operations

2000 Second Avenue  
Detroit, Michigan 48226  
(313) 237-8612

October 5, 1983

EF2 - 65,898

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:

- References:
- (1) Enrico Fermi Atomic Power Plant, Unit 2  
NRC Docket No. 50-341
  - (2) Letter H. Tauber to R. L. Tedesco,  
EF2-53285, dated May 14, 1981, "TMI Task  
Action Item I.G.1, Special Low Power Test  
Program for BWR's"
  - (3) Letter W. F. Colbert to L. L. Kintner,  
EF2-53430, dated June 3, 1981, "Simulated  
Loss of AC Power Special Test"
  - (4) Letter W. F. Colbert to L. L. Kintner,  
EF2-53825, dated June 22, 1981, "Position  
on I.G.1 Special Test"
  - (5) Letter H. Tauber to B. J. Youngblood,  
EF2-60717, dated February 14, 1983,  
"Simulated Loss of AC Power Test"
  - (6) Letter D. B. Waters to U. S. Nuclear  
Regulatory Commission, Attn: D. G. Eisenhower,  
BWROG-8120, dated February 4, 1981 "BWR  
Owners' Group Evaluation of NUREG-0737  
Requirement I.G.1, Training During Low  
Power Testing"
  - (7) Letter D. G. Eisenhower to all BWR Operating  
License Applicants, Generic Letter 83-24,  
dated June 29, 1983, "TMI Task Action Plan  
Item I.G.1, 'Special Low Power Testing and  
Training,' Recommendations for BWR's"

Subject: Commitment to BWR Owners' Group Position in  
Accordance with Generic Letter 83-24

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The following is submitted in response to Generic Letter 83-24 (Reference 7) dealing with TMI Action Plan I.G.1, Special Low Power Testing and Training.

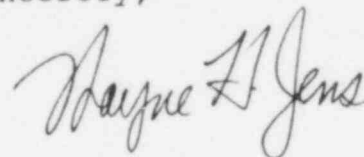
Detroit Edison has confirmed an earlier statement (Reference 5) that the station blackout test would pose a risk to drywell equipment. Calculations indicate that the non-safety related equipment in the drywell would reach a limiting temperature (185 degrees F) within approximately three (3) minutes. Therefore, since the test would provide little if any meaningful data but has a high potential of damaging equipment, Detroit Edison will comply with the BWR Owners' Group recommendation to constitute compliance with Item I.G.1. This position has been confirmed in analysis performed for the Susquehannah and LaSalle plants.

As noted on page 20 of Reference 6, Detroit Edison has supported the BWR Owners' Group position as being necessary and sufficient to meet the requirement of Item I.G.1. Detroit Edison reaffirms this position and commits to comply with the Owners' Group position detailed in Reference 6. The special tests so defined will be incorporated into our present programs for preoperational and startup testing and will be handled in the same manner as the other tests and test procedures within this programming in accordance with the requirements of Regulatory Guide 1.68.

It is the position of Detroit Edison that the above commitment supersedes previous commitments made in References 2, 3, 4, and 5. Section H.I.G.1 in appendix H of our FSAR will be revised to replace all previous commitments related to the Station Blackout test with a commitment to comply with the BWR Owners' Group position.

If you have any questions, please contact Mr. O. Keener Earle (313) 586-4211.

Sincerely,



cc: Mr. P. Byron  
Mr. M. D. Lynch