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Vice President
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**Detroit
Edison**

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June 13, 1984
EF2-6819

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) Fermi 2
(2) Letter from Detroit Edison to NRC,
EF2-53421, dated May 29, 1981
(3) Safety Evaluation Report for Fermi 2
(SER), NUREG-0798, July 1981

Subject: Reporting Failures of Safety/Relief Valves

Fermi 2 FSAR, Section H.II.K.3.3, presently requires the following:

"Detroit Edison will report a failure of a safety/relief valve to open or close when called upon within 24 hours by phone; the report will be confirmed by telegraph (or similar transmission) the first working day following the event and followed up with a written report in 2 weeks. This written report will be in the form of a Licensee Event Report"

This position is consistent with both Reference 2 and Section II.K.3 of Reference 3.

However, as you are aware 10CFR50.73 was recently added to the regulations. Consequently, the above referenced FSAR section will be revised in a forthcoming amendment and the applicable implementing documents (e.g., Technical Specifications, plant procedures) have been or will be revised to reflect a 30-day schedule for submittal of the subject report. This report will be in the form of a Licensee Event Report. In addition, the reporting requirements of the newly amended 10CFR50.72 will apply if the situation warrants.

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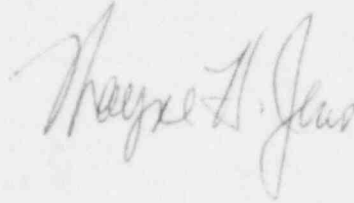
Boo!
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The attachment provides the proposed FSAR revision.

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

Sincerely,



cc: Mr. P. M. Byron*
Mr. M. D. Lynch*
USNRC, Document Control Desk*
Washington, D.C. 20555

*With attachment

H.II.K.3.3 Report Safety and Relief Valve Failures Promptly and Challenges Annually

H.II.K.3.3.1 Statement of Concern

The record of relief valve failures to close for all BWRs in the past 3 years of plant operation is approximately 30 in 73 reactor years (0.41 failures per reactor year). This has demonstrated that the failure of a relief valve to close would be the most likely cause of a small-break LOCA. The high failure rate is the result of high relief valve challenge rate and a relatively high failure rate per challenge (0.16 failures per challenge). Typically, five valves are challenged in each event. This results in an equivalent failure rate per challenge of 0.03.

H.II.K.3.3.2 NRC Position

All future safety and relief valve challenges and failures should be reported to the NRC. This should include the prompt reporting of failures through Unusual Event Reprints and the reporting of challenges in the annual report (Reference 1).

H.II.K.3.3.3 Detroit Edison Position

Detroit Edison will report a failure of a safety/relief valve in accordance with 10CFR50.73 and guidance presented in NUREG-1022. This written report will be in the form of a Licensee Event Report in accordance with plant reporting requirements. If appropriate and applicable, reporting will also be done in accordance with 10CFR50.72.

The Detroit Edison annual report to the NRC will list each safety/relief valve that is challenged during the year and will include the number of times each valve is challenged.

H.II.K.3.3.4 Reference

1. U.S. Nuclear Regulatory Commission, Generic Evaluation of Feedwater Transients and Small-Break Loss-of-Coolant Accidents in GE-Designed Operating Plants and Near-Term Operating License Applications, NUREG-0626, pp. 1-16, item B.14, January 1980.