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August 15, 1984  
EF2-69696

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

Dear Mr. Keppler:

Reference: (1) Fermi 2  
NRC Docket No. 50-341

(2) Letter, D. A. Wells to J. G. Keppler,  
June 11, 1982, EF2-58074

(3) Letter, D. A. Wells to J. G. Keppler,  
October 8, 1982, EF2-59399

Subject: Final Report of 10CFR50.55(e) Item 68  
"Defective Pipe Support Strut Swivel Bearings"

This is Detroit Edison's final report of Item 68, "Defective Pipe Support Strut Swivel Bearings." This item was originally reported as a potential 10CFR50.55(e) deficiency on May 14, 1982 and subsequently documented in References (2) and (3).

Description of Deficiency

This problem involves loose or, in some cases, dislodged sway strut swivel bearings. The problems identified at Fermi 2 are similar to the problems described in IE Circular 81-05.

During construction activities in the Residual Heat Removal (RHR) Complex, a contractor's quality control department identified various problems with sway strut installations. These problems were documented in Nonconformance Reports (NCRs) #370 and #370A. The NCRs identified 21 pipe supports with discrepancies such as, loose or dislodged bearings, excessive gaps and missing or inadequate washers.

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### Analysis of Safety Implications

Failure of the sway struts to function as designed could induce stresses not considered in the piping analysis of a safety related system.

### Corrective Action

Edison placed an engineering hold on any rework, pending resolution of the problem and development of a coordinated corrective action plan with the appropriate vendors.

The following actions were taken to correct the deficiencies and prevent recurrence.

- o Edison, in conjunction with the appropriate vendors, developed and implemented procedures to rework the affected swivel bearings.
- o Training sessions were conducted with craft, engineering and quality control personnel on the corrective measures delineated in the procedures.
- o The corrective action included staking and/or re-securing the affected swivel bearings.

In addition to the corrective actions to resolve the nonconforming items, Detroit Edison initiated the following actions to insure the proper operation of all sway strut swivel bearings.

- o Edison conducted a survey of approximately 50 randomly selected sway strut installations for swivel bearing problems. Based on a 10% rejection rate and the identification of other strut related deficiencies, Edison elected to complete a 100% engineering evaluation of all sway strut installations.
- o All rework actions identified by the evaluation program have been documented on Deviation Disposition Requests (DDRs) or Work Assignment Sheets/Material Notices (WASMNs).

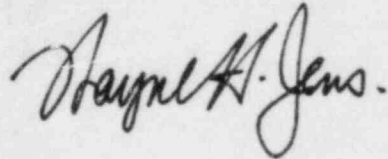
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o In addition to sway strut evaluations, Edison included all hydraulic and mechanical snubbers in another evaluation program. No dislodged bearings were found.

The required rework in the Drywell is complete. The balance of the safety related rework is in the final stages of completion.

This is Detroit Edison's final report on this item. If you have questions concerning this matter, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wayne A. Jens." with a period at the end.

cc: Mr. P. M. Byron  
Mr. R. C. DeYoung  
Mr. R. C. Knop