

Detroit
Edison

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Nuclear
Operations

May 20, 1992
NRC-92-0068

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) NRC Letter, "Fermi-2 Conformance to Station Blackout Rule 10CFR50.63 (TAC No. 68545)", dated June 12, 1991.
 - 3) Detroit Edison Letter, NRC-91-0086, "Station Blackout Rule Implementation", dated July 17, 1991.
 - 4) Detroit Edison Letter, NRC-92-0017, "Completion of Station Blackout Rule Implementation", dated February 21, 1992.
 - 5) NRC Letter, "Fermi-2 - Supplemental Safety Evaluation - Response to Station Blackout Rule (TAC No. M81254)", dated April 9, 1992.
 - 6) NUMARC 87-00, Revision 1, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors", dated August 1991.

Subject: Confirmation Response to NRC Supplemental Safety Evaluation on Fermi 2 Implementation of Station Blackout Rule (10CFR50.63)

By the Reference 2 letter, the NRC staff forwarded to Detroit Edison its initial Safety Evaluation (SE) of Fermi 2's conformance to the Station Blackout (SBO) Rule, i.e., 10CFR50.63. Detroit Edison responded to the NRC staff's recommendations contained in the SE via References 3 and 4. By the Reference 5 letter, the NRC found the Fermi 2 responses acceptable and provided the staff's Supplemental Safety Evaluation (SSE). The SSE completes the NRC staff's review and closure of Fermi 2's conformance to the SBO Rule. However, the staff requested that Detroit Edison confirm "that a procedure is established to ensure that each containment isolation valve will be in its appropriate position during an SBO event" by stating our commitment and schedule for establishing that procedure. The purpose of this

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letter is to confirm Detroit Edison's commitment on this procedure and provide a schedule for its final implementation.

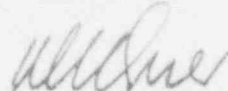
As discussed in the NRC's SSE (section 2.6, "Containment Isolation"), Detroit Edison has indicated that valves necessary for containment isolation or which must be operated (cycled) during a four-hour SBO event can be positioned (with indication) independent of the preferred and blacked out unit Class 1E emergency power supply. Means of closure include manual operation, DC-powered supply, alternate AC-powered operation and air-operated valves that fail closed on loss of air. Valve position can be determined by either control panel indicating lights or by mechanical valve position indicators at the valve. This position, as noted by the NRC in the Reference 5 SSE, is consistent with the Reference 6, NUMARC 87-00, Revision 1, guidelines. This position satisfied the NRC staff's technical concerns on containment isolation valves.

Regarding the procedure requested by the NRC in Reference 5, Detroit Edison currently has procedural guidance in this area. In light of the NRC staff's specific request and based on a followup teleconference with Mr. Timothy Colburn of your staff, Detroit Edison is reviewing current procedural guidance. Based on the results of this review, the Fermi 2 procedure(s) affected will be revised, as needed, to fulfill the requested commitment regarding ensuring containment isolation valve appropriate positions during an SBO event. This review and any revision(s) to affected Fermi 2 procedure(s) will be completed by July 31, 1992. This schedule is provided per 10CFR50.63(c)(4). Mr. Colburn will be notified verbally when this action has been fully implemented.

Detroit Edison reconfirms that all required SBO evaluation documentation is available onsite for review at your discretion. Detroit Edison is maintaining the SBO analyses and related information (e.g., the documentation supporting previous SBO submittals to the NRC) for any future NRC inspections and/or conformance audits in this area.

If there are any questions regarding this matter, please contact Mr. Terry L. Riley, Supervisor, Nuclear Licensing, Regulatory Affairs, at (313) 586-1684.

Sincerely,



cc: T. G. Colburn
A. B. Davis
M. Phillips
S. Stasek