

Wayne H. Jens
Vice President
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**Detroit
Edison**

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(313) 586-4150

September 5, 1984
EF2-72769

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
NRC Docket No. 50-341

(2): Detroit Edison to NRC Letter, "Submittal of
Revision 2 of Report on Inservice Testing of
Pumps and Valves", EF2-65368, Oct. 4, 1983

Subject: Inservice Testing of Pumps and Valves

Reference (2) submitted Revision 2 to the Fermi 2 Report on
Inservice Testing of Pumps and Valves. The letter also
contained responses to open items pending from the May 17-18
meeting between Detroit Edison and your staff's consultants
from EG & G, Idaho. Attached to this letter are the
resolutions to the remaining open items pending from
Reference (2).

In addition, based on conversations with Mr. Bob Kirkwood of
the Mechanical Engineering Branch, Detroit Edison commits to
make the following modifications to its Inservice Testing
Program for Pumps and Valves (Reference 2):

1. Relief Request PR-5 - Diesel Fuel Oil Transfer Pump

This relief request will be deleted. Detroit Edison
will provide for quarterly measurement of reference
values as required by Article IWP of Section XI of the
Code.

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2. Relief Request VR-6 - All Solenoid Operated Valves

This relief request will be changed to indicate that two seconds instead of five seconds will be used to define short stroke times. It is our understanding that this is consistent with the NRC position on this subject.

3. Relief Request VR-12 - Control Rod Drive

This relief request will be deleted and replaced with new relief requests VR-43 and VR-44 (see item B.2 in the attachment).

4. Relief Request VR-39 - Combustible Gas Control

This relief request will be deleted.

5. Relief Request VR-14 - Nuclear Boiler

As with item 2 above, this relief request will be changed to indicate that 2 seconds versus 5 seconds will be used as the limiting time to demonstrate adequate valve operability.

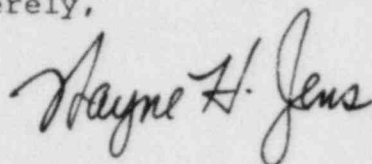
Your concurrence with the above modifications should close all remaining open items relative to the Fermi 2 Inservice Test Program for Pumps and Valves. After your concurrence, Revision 3 to the Program will be issued to account for the above changes and other minor revisions due to design and program evolution.

Detroit Edison remains concerned, however, that until full implementation of this program is achieved under operating conditions, all deficiencies associated with its implementation may not have been identified. Therefore, Edison reserves the right to request from the Commission those program revisions that may be authorized by the Commission's regulations.

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

Sincerely,

A handwritten signature in cursive script, reading "Wayne H. Jens".

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

* With attachments

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bcc: F. E. Agosti*
L. P. Bregni
W. F. Colbert*
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W. R. Holland
R. S. Lenart*
E. Lusic
P. A. Marquardt
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A. E. Wegele

Approval Control*

O. K. Earle (Bethesda Office)*
M. S. Rager*
24th Floor Reading Room
NRR Chron File*

* With Attachments

Responses to IST Program Open Items
From DECo Letter EF2-65368, Oct. 4, 1983

A. Responses to Open Items from Attachment A to EF2-65368

1. 6M721-2023 Feedwater System

Open Item: The installed excess flow check valves V13-2392 and V13-2393 are in the IST program, but do not appear as excess flow check valves on 6M721-2023, Revision N.

Response: The current revision of 6M721-2023 shows V13-2392 and V13-2393 as excess flow check valves.
2. 6I721-2145-66 Traversing In-Core Probe System

Open Item: The check valve C51-J009 does not appear on Revision A of 6I721-2145-66. Exactly what drawing C51-J009 will appear on has yet to be decided.

Response: Drawing 6I721-2837-6 has the best view of the TIP System and will be used in place of 6I721-2145-66. 6I721-2837-6 will be changed to include the check valve.
3. 6M721-2081 Control Rod Drive Hydraulic System

Open Item: Valve C11-144 at coordinate A-B should be valve C11-114, as shown in the IST program.

Response: The current revision of 6M721-2081 shows C11-114.
4. 6M721-2083 Residual Heat Removal System, Division II

Open Item: Valve V13-7688 has been installed, however, it does not appear in Revision M of 6M721-2083. Valve V13-7688 is on a 1" bypass line around the containment isolation valve E11-F050B (V8-2164). Valve V13-7688 allows the pressure to be equalized across E11-F050B so that this testable check valve can be exercised during cold shutdown.

Open Item: Valve V8-3874 has also been installed and is not shown on Revision M of 6M721-2083. This valve is on a 3/4" bypass line around the containment isolation valve E11-F608 (V8-3407). This bypass line allows heated water trapped inside the RHR shutdown cooling suction line to be relieved into the reactor vessel.

Responses to IST Program Open Items
From DECo Letter EF2-65368, Oct. 4, 1983

A. Responses to Open Items from Attachment A to EF2-65368 (Cont'd)

Response: Valves V13-7688 and V8-3874 are shown on the current revision of 6M721-2083.

5. 6M721-2084 Residual Heat Removal System, Division I.

Open Item: Valve V13-7687 has been installed but does not appear on Revision P of 6M721-2084. Valve V13-7687 is on a 1" bypass line around the containment isolation valve E11-F050A (V8-2163). Valve V13-7687 allows the pressure to be equalized across E11-F050A so that this testable check valve can be exercised during cold shutdown.

Response: The current revision of 6M721-2084 shows V13-7687.

6. 6M721-5449 Control Rod Drive Hydraulic System - Part 2

Open Item: Relief Valve C11-F012 (V22-2027) originally was located on F&ID 6M721-2081, Revision 1. It should appear with the scram discharge volume on 6M721-5449, however, C11-F012 is not shown on Revision 0 of 6M721-5449.

Response: Valve C11-F012 has been deleted from the system. This valve will be deleted from the IST program.

Responses to IST Program Open Items
From DECo Letter EF2-65368, Oct. 4, 1983

B. Responses to Open Items from Attachment B to EF2-65368

1. H.1 Core Spray (6M721-2034)

Open Item: Detroit Edison is investigating the removal of the valve internals from check valves E21-F017B (V8-3181) which are lines that lead from relief valves to the suppression pool, since these valves do not perform a safety related function. Because there is a high probability that the valve internals will be removed, these check valves along with Relief Request VR-19 have been deleted from the program. If removal of the valve internals is not possible, valves E21-F017A and E21-F017B will be put back into the program and appropriate testing procedures will be developed.

Reponse: The check valves leading from the relief valves to the suppression pool do not perform a safety related function and the valve internals have been removed. Therefore, these valves will not be included in the program.

2. M.1 Control Rod Drive Hydraulic System (6M721-2081)

Open Item: An appropriate testing method and frequency for C11-115 and C11-138 will be submitted in October, 1983.

Response: The attached new relief requests (VR-43 and VR-44) present technically sound methods for testing C11-115 and C11-138. These relief requests replace VR-12.

Relief Request VR-43

SYSTEM: Control Rod Drive

COMPONENT: C11-115 (Typical of 185 valves)

CATEGORY: C

FUNCTION: For a scram to occur, C11-115 must close to prevent back flow into the charging water header.

TEST REQUIREMENT: Exercise check valve in the close direction every three months (CT-1).

BASIS FOR RELIEF: During normal operation, the drive water pumps supply drive water and cooling water to the control rods. In order to test C11-115 in the close position, the drive water pumps must be shut down, thus interrupting the supply of cooling water to the control rods. Interruption of cooling water would cause excessive temperature in the control rods.

ALTERNATE TESTING: The check valve will be exercised once every 18 months during the CRD accumulator system integrity test. Normal water level in the accumulator verifies that the check valve opens properly.

Relief Request VR-44

SYSTEM: Control Rod Drive

COMPONENT: C11-138 (Typical of 185 valves)

CATEGORY: C

FUNCTION: For a scram to occur, C11-138, must close to prevent back flow into the cooling water header.

TEST REQUIREMENT: Exercise check valve in the close position every three months (CT-1).

BASIS FOR RELIEF: Due to system configuration, direct verification that the check valve closes is not practical. Indirect verification of valve closure is provided each time a control rod is moved.

If C11-138 fails to close properly, the rod will fail to insert because drive water at a pressure between 90 psi and 260 psi above reactor pressure will flow into the cooling water header which operates at approximately 20 psi above reactor pressure.

ALTERNATE TESTING: When the reactor is in either Operation Condition 1 or 2 and the thermal power is above the preset power level of the rod worth minimizer and the rod sequence control system, all operable and withdrawn control rods will be moved at least one notch once per seven days per Technical Specification paragraph 4.1.3.1.2.