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September 7, 1984
EF2-72237

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

Reference: Fermi 2
NRC Docket No. 50-341

Subject: Detroit Edison's Response to Open Items
Identified in NRC Environmental Qualification
Audit, July 16-18, 1984

Dear Mr. Youngblood:

During the course of the NRC Equipment Qualification Audit conducted on July 16-18, 1984 by Mr. A. S. Masciantonio of your EQ branch, three open items were identified relating to the Fermi-2 EQ program. This letter provides Detroit Edison's responses/commitments to these open items.

The three open items which were identified during the EQ audit are as follows:

1. Fermi-2 is to develop and implement a surveillance program for cable inside the drywell to detect the degradation caused by synergistic effects of low dose rate radiation and temperature.
2. Fermi-2 is to revise the existing qualification central files to document, in more detail, the evaluation of the acceptance criteria established for Fermi-2 specific applications as compared to the results and anomalies identified in the test report for qualified components.
3. Fermi-2 is to address post-accident accuracy requirements for certain instruments contained in the Fermi-2 NUREG-0588 submittal, dated July, 1983.

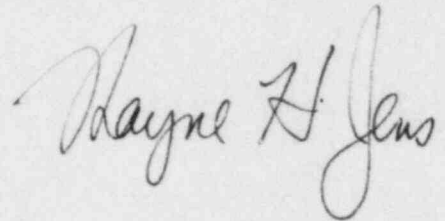
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Mr. B. J. Youngblood
September 7, 1984
EF2-72237
Page 2

The Detroit Edison Responses/commitments to the above three items are contained in Attachments 1, 2 & 3 respectively.

If you have any further questions on this matter, please contact Mr. O. K. Earle (313) 586-4211.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wayne H. Jones". The signature is written in dark ink and is positioned to the right of the typed name "Wayne H. Jones".

All with attachments

cc: P. M. Byron
M. D. Lynch
A. S. Masciantonio
USNRC, Document Control Desk
Washington, DC 20555

Mr. B. J. Youngblood
September 7, 1984
EF2-72237
Page 3

bcc: F. E. Agosti*
L. P. Bregni
W. F. Colbert*
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O. K. Earle
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NOC Approval Control--ARMS Coding*
O. K. Earle (Bethesda Office)*
M. S. Rager*
NRR Chron File*

* With Attachments

ATTACHMENT 1

Open Item: Open Item: Fermi-2 is to develop and implement a surveillance program for cables inside the drywell to detect the degradation caused by synergistic effects of low dose rate radiation and temperature.

Response: Detroit Edison is investigating the EPRI/University of Connecticut Program (RP1707-13) for the study of natural/artificial equipment aging. Specifically, we plan to participate in the study of cables located in reactor containments. This program will provide data on material aging of cables actually installed in reactor containments and compare these results to what would be predicted using currently accepted aging techniques. One of the objectives of this program is to provide a basis for more reliable lifetime predictions for cable. Results of the program are also expected to help resolve the issue of synergistic effects.

Participation in this program will provide Edison with substantial information on natural cable aging and will allow us to better judge the validity of the previous environmental testing performed and identify possible future actions to be taken to maintain cable inside the drywell in an operable state. The participation in this program and the evaluation of the results as it applies to Fermi-2 will alleviate the above mentioned NRC open item.

ATTACHMENT 2

Open Item: Fermi-2 is to revise the existing Qualification Central Files to document, in more detail, the acceptance criteria established for Fermi-2 specific applications as compared to the results and anomalies identified in the test report for qualified components.

Response: Detroit Edison has re-reviewed all Qualification Central Files for qualified equipment contained in our Response to NUREG-0588, dated July 1983. Out of a total of 46 existing Central File Packages, a total of 28 central file packages will require revision to address a more detailed explanation of the test results, particularly anomalies, as compared to Fermi-2 applications. These anomalies were either resolved by the manufacturers in the test reports or by Detroit Edison when preparing the QER (Qualification Evaluation Reports). The evidence that resolutions are acceptable for Fermi-2 specific applications however, in all cases, are not documented. Of the files that were audited by the NRC EQ reviewer, resolutions provided were acceptable to him. These resolutions provide supplemental justification to the qualification status of the equipment. We expect that this central file revision will be completed prior to fuel load.

ATTACHMENT 3

Open Item: Fermi-2 is to address post-accident accuracy requirements for certain instruments contained in the Fermi-2 NUREG-0588 submittal, dated July 1983.

Response: Post-accident accuracy requirements for certain instruments contained in the Fermi-2 NUREG-0588 submittal dated July 1983 will be addressed. This effort will be in concert with the proposed program of the LRG Instrumentation Setpoint Methodology Group described in a June 29, 1984 letter from J. F. Carolan to T. M. Novak. This is consistent with the response given during the NRC audit.