

Detroit
Edison

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Nuclear
Operations

June 11, 1992
NRC-92-0070

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-41
NRC License No. NPF-43
 - 2) Detroit Edison Letter to NRC, NRC-88-0175, "Answer to a Notice of Violation and Reply to a Notice of Violation", dated July 15, 1988
 - 3) Detroit Edison Letter to NRC, NRC-88-0173, "Proposed Technical Specification Change (License Amendment) - Noninterruptible Control Air System", dated August 5, 1988
 - 4) Detroit Edison Letter to NRC, NRC-89-0298, "Proposed Technical Specification Change (License Amendment) - Noninterruptible Control Air System", dated January 26, 1990
 - 5) Detroit Edison Letter to NRC, NRC-91-0038, "Withdrawal of Proposed License Amendment on the Noninterruptible Control Air System (TAC No. 77697) and Documentation of Withdrawal of Proposed License Amendment for Cycle 2 Extension (TAC No. 76904)", dated March 28, 1991
 - 6) NRC Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability", dated November 7, 1991

Subject: Technical Specifications for the Fermi 2
Noninterruptible Control Air System

The purpose of this letter is to transmit Detroit Edison's position that a Technical Specification (TS) change to directly address the Noninterruptible Control Air System (also referred to as the Noninterruptible Air Supply or NIAS) is not necessary.

The need for an NIAS TS was identified in Detroit Edison's response to a Civil Penalty (Reference 2) where the NRC cited Detroit Edison for failure to act in accordance with the TS when an NIAS compressor was out-of-service. This response indicated that Detroit Edison was

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preparing a TS proposal to specifically address the NIAS. The purpose of this proposal was to emphasize the importance of the NIAS system and the Technical Specifications.

Detroit Edison submitted proposed NIAS TS by References 3 and 4. Each of these proposals was withdrawn in order to address NRC staff requests for further information (most recently in Reference 5). Reference 5 also indicates that Detroit Edison plans to resubmit NIAS TS.

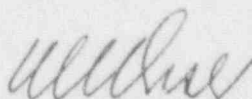
The Reference 2 Civil Penalty arose due to difficulty in using the definition of operability (Specification 1.25) in the context of the NIAS design, particularly the ability to cross-tie the two subsystems. Detroit Edison believed a TS was necessary to properly reflect this design feature. It was believed that the cross-tie feature's enhanced reliability could also justify an Allowed Out-of-Service Time (AOT) of longer than the 7 days provided for by applying the operability definition to the supported systems. A longer AOT was also proposed to allow additional time to respond to possible NIAS compressor failures.

Two things have occurred in the past four years to eliminate the need for an NIAS TS. First, continued Industry-NRC interaction concerning support systems and the operability definition has yielded a framework for application of the operability definition which is compatible with the NIAS design. This framework is described in Generic Letter 91-18 (Reference 6).

Secondly, performance improvements at Fermi 2 in the maintenance area have led to confidence that NIAS problems can be successfully resolved in a seven day time frame allowed by application of the operability definition.

For these reasons, a specific NIAS TS is not needed to ensure safe operation of Fermi 2. If you have any questions, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,



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