Appendix

NOTICE OF DEVIATION

Detroit Edison Company

Docket No. 50-341

Based on the results of the NRC inspection conducted May 14-18, June 5, and July 10-11, 1984, certain of your activities appear to deviate from your commitments to the Commission and applicable codes and standards approved by the Commission and have safety significance as indicated below:

1. By letters dated July 31, 1981, November 24, 1981 and January 4, 1982, the applicant provided the NRC with the results of fire tests conducted on the control room panels containing the controls, instrumentation and associated circuits for all the required safe shutdown systems. As a result of the fire test conducted, the applicant committed to certain design modifications to the panels to enhance their fire resistive capabilities and provide assurance that one train of systems needed for safe shutdown would remain free of fire damage in the event of a control room fire.

The applicant committed to meet the requirements of Appendix R to 10 CFR Part 50 as discussed in a meeting with the NRC staff on May 27, 1981, and to demonstrate that a single fire would not damage both redundant safe shutdown trains.

Contrary to the above, the applicant failed to provide the design modifications to the control room panels containing the controls, instrumentation and associated circuits for all of the required safe shutdown systems that were described in the FSAR, SER and letter submitted to the NRC. The as-built configuration of these panels does not provide assurance that one train of systems needed for safe shutdown will remain free of fire damage in the event of a control room fire. The applicant had no plans to complete these design modifications. This is considered a deviation from previous commitments to the Commission and is further discussed in paragraph 4c(4) of the inspection report.

2. In response to the NRC position stated in Appendix 9B of the Fermi-2 FSAR, the licensee made a commitment to install the fire pump installations in accordance with National Fire Protection Association (NFPA) Standard 20. NFPA 20 requires that the fuel oil storage tank for diesel engine driven fire pumps be full at all times and be free of all water and foreign material. The temperature of the pump room, pump house or areas where diesel engines are installed is required to be maintained not less than the minimum recommended by the engine manufacturer. This minimum is generally 70° F.

Contrary to the above, the diesel fire pump fuel oil storage tank is installed above ground outside of the fire pump house and is exposed to freezing temperatures and gelling of the diesel fuel during winter months. This condition does not meet the intent of NFPA 20 and could result in the failure of the diesel fire pump during cold weather. This is considered a deviation from previous commitments to the Commission and is further discussed in paragraph 7.a. of the inspection report.

Please advise us in writing within thirty days of the date of this letter of the corrective actions you have taken or plan to take, and the estimated date of completion with regard to these actions.

AUG 3 1 1984

Date

R. L. Spessard, Director

Division of Reactor Safety