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September 18, 1984
EF2-69711

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Letter, H. Tauber to B. J. Youngblood,
July 19, 1983, EF2-63957

(3) Letter, W. H. Jens to B. J. Youngblood,
March 14, 1984, EF2-67709

(4) Letter, W. H. Jens to J. G. Keppler,
March 27, 1984, EF2-65730

(5) Letter, W. H. Jens to J. G. Keppler,
May 25, 1984, EF2-68548

Subject: Final Report of 10CFR50.55(e) Item 117
"Commercial Grade Replacement Parts in
QA-I Applications"

This is Detroit Edison's final report concerning Item 117, "Commercial Grade Replacement Parts in QA-I Applications." Item 117 was originally reported as a potential deficiency on February 15, 1984 and was subsequently documented in references (4) and (5) which provided a description of the deficiency, an analysis of the safety implications, a committed corrective action with established methodologies to resolve the issue, the progress to date and the completion schedule. All information provided in references (4) and (5) is still valid.

We have completed our review of all CQ electrical and mechanical parts that have been installed in harsh environment, representative samples of CQ electrical and mechanical parts installed in mild environment and all CQ installed structural materials.

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The electrical parts that have been installed in harsh environment include relays, breakers, overload heaters, transmitters, transducers, switches, valve motor operators, terminal blocks and connectors. These parts are associated with the harsh environment systems identified in our Electrical Equipment Qualifications (EEQ) submittal, reference (2). Parts were evaluated for their required operability and their environmental and seismic requirements.

This evaluation is completed and as a result a total of approximately one-hundred and fifty (150) CQ file packages were developed to document our evaluation and justification for the use of these parts in safety-related applications. No deficiencies were identified; therefore, no further corrective action is required.

Four systems that contain electrical parts in mild environment were selected for review on a sample basis. These systems represent a large number of equipment types located in several locations from the RHR Complex to the Control Center. This evaluation has been completed. A total of more than fifty (50) CQ file packages were developed to document our evaluation and justification for the use of these parts in safety-related applications. No deficiencies were identified; therefore, no further corrective action is required.

For the mechanical parts, all installed items located in harsh environment, that were identified in our Mechanical Equipment Qualification (MEQ) submittal, Reference (3), and representative samples of the installed items in mild environment have been evaluated. Mechanical parts mainly include gaskets, packing, seals, O-rings, grease, oil and lubricants. A total of approximately fifty (50) CQ file packages were developed to document our evaluation and justification for the use of these parts in safety-related applications. No deficiencies were identified; therefore, no further corrective action is required.

Structural materials represent a large number of the total item population. Structural materials include nuts, bolts, anchors, and support materials. They are divided into three (3) categories: The alpha group addresses mainly mild steel such as A307 bolts and A36 structural steel, the beta group addresses high strength carbon steel such as A490 bolts and A514 structural steel and the gamma group addresses stainless steel materials and other potentially sensitive items from a life utilization standpoint. All three groups have been evaluated and found acceptable. A total of fifteen (15) generic position papers were issued to document our evaluations and to justify the use of these materials in safety-related applications.

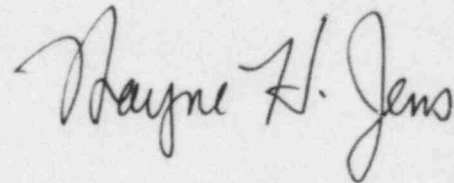
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During the period from July 11 through 27, 1984, an NRC inspection was conducted in which several CQ file packages of installed electrical, mechanical and structural items as well as new CQ purchases were reviewed. At the exit meeting, it appeared that the Edison CQ program and its implementation were acceptable.

On the basis that all reviews of the harsh environment CQ materials, which is the worst case, as well as a cross section of mild environment CQ materials have been completed and no deficiencies were identified, Detroit Edison concludes that all past-purchase installed materials have been properly dedicated for safety-related applications. Therefore, no further work in this area is required. Detroit Edison will continue with our CQ program for new purchases to support plant testing and operation.

This is Detroit Edison's final report on this item. If you have questions concerning this matter, please contact Mr. Lewis P. Bregni at (313) 586-5083.

Sincerely,



cc: P. M. Byron
R. C. DeYoung
R. C. Knop