



150 North Wacker Drive, Chicago, IL 60606

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November 16, 1984

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

Mr. William F. Colbert, General Supervisor  
Nuclear Safety and Plant Engineering (342 NOC)  
The Detroit Edison Company  
Enrico Fermi-2 Nuclear Operations Center  
64 North Dixie Highway  
Newport, Michigan 48166

Subject: Telephone Conversation Summary - 11/5/84  
Independent Design Verification Program  
Detroit Edison - Enrico Fermi Unit 2  
Docket #50-341

- References: 1) NRC Letter from B.J. Youngblood to Wayne H. Jens  
of Detroit Edison and L.L. Kammerzell of Cygna  
dated March 27, 1984
- 2) Detroit Edison Letter from Wayne H. Jens to  
B.J. Youngblood of NRC dated September 27,  
1984 (EF2-72252)

Dear Mr. Youngblood:

On November 5, 1984, a telephone conversation occurred between Mr. M.D. Lynch of the NRC and Mr. D.A. Ferg of Cygna concerning the Final Report for the Independent Design Verification Program (IDVP) on Fermi-2. The discussion centered on Cygna's response to Enclosure 2, Item 2 to the referenced NRC letter (Reference 1) involving annulus pressurization (A/P) loads. In the conversation, Mr. Lynch questioned why Cygna had not generated a Potential Finding Report as a result of the annulus pressurization review question.

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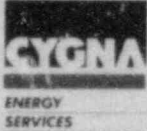
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Cygna originally raised the question of A/P loading on piping during the initial IDVP review stage. At that time, Cygna noted that A/P loads were considered in the support design but not in the pipe stress design. Observation PI-01-11 was written and subsequently closed based principally upon the GE design specification which explicitly omitted A/P loads as a design requirement. In reference (1), the NRC stated that A/P loads should be included in the design basis assessment and requested further study by Cygna.

As indicated in our response submitted to the NRC and Detroit Edison on October 19, 1984, Cygna found sufficient differences between the A/P analytical model geometry and the as-built configuration to preclude drawing a conclusion on structural integrity of the RHR piping element under faulted load conditions. Furthermore, sufficient documentation for the A/P load study performed by Detroit Edison/GE was not available for Cygna to reconcile the differences in geometry. This position was first identified to the NRC and Detroit Edison in a meeting in Bethesda, Maryland on May 11, 1984.

In a subsequent telephone conversation in late May, 1984 (Attachment A), the NRC indicated that Detroit Edison would be performing re-analyses of the reactor annulus piping for faulted loads. We were advised that the NRC and Detroit Edison had agreed to resolve this issue without further review by Cygna. Without the A/P reanalysis results Cygna was unable to proceed further with our review activities in response to Enclosure 2, Item 2 in the referenced NRC letter.

If the review process had proceeded and a Potential Finding Report had been written, Cygna would have asked to review the reanalyses referenced in the September 27, 1984 letter from Detroit Edison to the NRC (EF2-72252, Reference 2). This requirement is contained in Cygna's methodology for conducting the IDVP and resolving Potential Finding Reports (refer to Section 3.0 in the IDVP Final Report, Volume 4). This review would be performed in order for Cygna to make a determination with respect to the effect of annulus pressurization on plant safety.



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Reference 2 provided the NRC a specific response to Enclosure 2, Item 2 in Reference 1. At this point, Cygna expects that the NRC and Detroit Edison will resolve the A/P loads issue without requiring Cygna to proceed with additional IDVP review. Unless Cygna is directed to review the A/P load reanalyses submitted by Detroit Edison in Reference 2, the present documentation or information contained in the IDVP Final Report should be sufficient.

If you have any further questions or comments on the A/P loads issue or if you require further clarification of Cygna's position, please contact us as soon as possible.

Very truly yours

  
David A. Ferguson  
Project Manager

DAF/bw

cc: M. D. Lynch (NRC, NRR-DOL)  
J. G. Keppler (NRC IE, Region III)  
O. K. Earle (DECo)