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November 21, 1984
EF2-72004

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

Dear Mr. Youngblood:

- Reference:
- 1) Fermi 2
NRC Docket No. 50-341
 - 2) Detroit Edison letter to NRC, "Inservice Testing of Pumps and Valves", EF2-72769, dated September 5, 1984.

Subject: Inservice Testing Program Clarification

Reference 2 provided Detroit Edison's revision and withdrawal of several relief requests affiliated with the Fermi 2 inservice testing program for pumps and valves. The following is a clarification to the intent of that letter:

- a) Relief Request PR-5 will be modified to reflect its deletion.
- b) Relief Request VR-6 will be revised to indicate that two seconds will be used to define valves with very short stroke times. [SSER 4, Section 3.9.6 (b) indicates that this revision is acceptable.]

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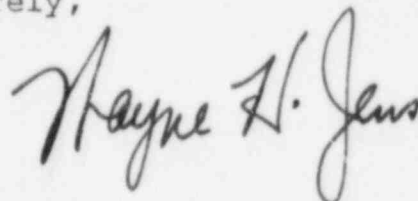
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- c) Relief Request VR-12 will be revised to delete reference to valves C11-115 and C11-138. [Reference 2 transmitted Relief Requests VR-43 and VR-44 for valves C11-115 and C11-138, respectively.] Reference 2 mistakenly requested the deletion of this relief request, instead of the deletion of valves C11-115 and 118 from the scope of this request. Edison still requests relief for valves C11-114, C11-117, C11-118, C11-126 and C11-127 as delineated in Relief Request VR-12. [SSER 4, Section 3.9.6 (c) notes denial of Relief Request VR-12 as it pertains to valves C11-115 and C11-138, but does not address the approval/denial status of the request as it pertains to the other five valves.]
- d) Relief Request VR-14 will be revised to indicate that 2 seconds instead of 5 seconds is to be used as the limiting closure time in verifying operability of valve. [SSER 4, Section 3.9.6 (e) indicates this revision results in an acceptable testing approach.]
- e) Relief Request VR-39 will be modified to reflect its deletion.

Subsequent to conversations with your staff, it is unclear whether or not the SER will be revised to reflect the revisions and clarifications noted above. SSER 4 does not provide a comprehensive discussion of Relief Request VR-12, nor does it reflect Edison's redefining of short stroke time valves from 5 to 2 seconds. Therefore, please reflect this submittal in a forthcoming supplement to the SER.

If you have questions, or require further clarification, please contact Mr. O. K. Earle at (313) 586-4211.

Sincerely,



cc: Mr. P. M. Byron
Mr. M. D. Lynch*
Mr. R. Kirkwood*
USNRC, Document Control Desk
Washington, DC 20555

*With attachments

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