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November 28, 1984
EF2-72013



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

- References: 1) Fermi 2
NRC Docket No. 50-341
- 2) Detroit Edison letter to NRC, "Detroit
Edison Comments on NUREG-0798", EF2-69204,
dated July 20, 1984.

Subject: Comments on SSER 4

Dear Mr. Youngblood:

Detroit Edison recently completed a review of Supplement 4 to the Fermi 2 Safety Evaluation Report - NUREG 0798 (SSER 4). The review was conducted to identify differences in fact between SSER 4 and the Fermi 2 Final Safety Analysis Report, Technical Specifications and correspondence. These comments are provided in the attachment.

The comments provided in the attachment complement the comments provided via Reference 2 on the SER and its supplements 1, 2 and 3.

Also included are comments on certain of the proposed license conditions contained in Section 1.8 of SSER 4. Please review these in particular in your drafting of the operating license.

If you have any further questions on this matter, please contact Mr. O. K. Earle (313) 586-4211.

Sincerely,

All with attachments

cc: P. M. Byron
M. D. Lynch
T. H. Novak
USNRC, Document Control Desk
Washington, DC 20555

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SSER 1 Section: 18.1

SSER 1 Page: 18-1

SSER 4 Section: 1.8.2 (1)/3.10

SSER 4 Page: 1-3/3-5

Current SSER 4 Discussion:

SSER 1, Section 18.1:

"Before fuel loading, the applicant will have completed all (major and minor) containment modifications based on the containment plant-unique analysis.

Before the plant returns to power after the first refueling, the applicant will have completed all modifications based on the torus-attached piping analyses. The staff will condition the operating license to require modifications to be completed at this time."

SSER 4, Section 1.8.2 (1) identifies the following license condition: "Modifications to piping and equipment attached to Mark I containment."

Detroit Edison Comments:

The modifications committed to in the Plant Unique Analysis Report and in the Torus-Attached Piping Analysis have been implemented. Accordingly, this license condition can be deleted. NRC Region III has confirmed closure of this item. See NRC Region III to Detroit Edison letter dated November 13, 1984, forwarding Inspection Report No. 50-341/84-47 (refer to item 50-341/81-17-02).

SSER 4 Section: 1.8.2 (2)

SSER 4 Page: 1-3

Current SSER 4 Discussion:

Environmental Qualification of Equipment

Detroit Edison Comments:

This license condition is based on SSER 2 (January 1982) and is thus outdated and should be modified based on the more recent Edison submittals and NRC staff review.

SSER 4 Section: 1.8.2 (5)

SSER 4 Page: 1-3

Current SSER 4 Discussion:

Modifications to Fire Protection Equipment.

Detroit Edison Comments:

This license condition is based on SSER 2 (January 1982) and is thus outdated and should be modified based on the more recent Edison submittals and NRC staff review.

SSER 4 Section: 1.8.2 (7)

SSER 4 Page: 1-3

Current SSER 4 Discussion:

Retention of persons with BWR operating experience on shift until 100% power is achieved.

Detroit Edison Comments:

This license condition is based on SSER 1 (September 1981) and is outdated. It should be modified to account for Edison's use of shift operating advisors in concert with Generic Letter 84-16.

SSER 2 Section: 13.5

SSER 2 Page: 13-1

SSER 4 Section: 1.8.2 (8)

SSER 4 Page: 1-3

Current SSER 2/4 Discussion:

SSER 2: "In Supplement No. 1 to the SER, the staff stated that the Fermi 2 revised safeguards contingency plan and guard training plan were acceptable and that the revised physical security plan was under review...The operating license will be conditioned to require the licensee to fully implement and maintain in effect all provision of these approved plans."

SSER 4: This issue is identified as a pending license condition reading: "Implementation of safeguards contingency plan, guard training plan, and physical security plan."

Detroit Edison Comments:

The subject license condition will be a part of the license for the duration of the plant's life. Due to the current effort to minimize the number of conditions applied to a license, coupled with the fact that 10 CFR 50.54 (p) requires the same implementation and update requirements, Detroit Edison requests this license condition be deleted.

Current SSER Discussion:

Final Procedure for Post-Accident Sampling

Detroit Edison Comments:

The last reference to this license condition is in Supplement 3 not Supplement 2. However, the license condition should be modified based on more recent Edison submittals and NRC staff review. The PASS system will be operable prior to exceeding 5% power.

Current SSER 4 Discussion:

Section 1.8.2 (10) identifies the following license condition:

"Instrumentation for detection of inadequate core cooling (SER Section 22, Item II.F.2, and SER Supplement No. 1 Sections 18 and 22, Item II.F.2)."

Section 7.3.2 provides an evaluation of the Fermi 2 design with respect to reactor vessel water level sensing line failures and concludes:

"Based on our review of the applicant's analysis of the consequences of instrument sensing line postulated failures, we find that although certain postulated failures would require operator action, the operator has sufficient time and available information to diagnose the problem and initiate corrective action. In addition, we find that the applicant has administrative procedures to aid and direct the operator in the event of a sensing line failure. Therefore, we find that the Fermi-2 level measurement system design is acceptable."

Detroit Edison Comments:

The subject license condition from SSER 1 required, in essence, the installation of core thermocouples.

The license condition from SSER 1 should be deleted based on current information available from both the BWR Owners Group and Detroit Edison (as summarized, in part, in Section 7.3.2 of SSER 4). In addition, the current revision of Regulatory Guide 1.97 indicates that core thermocouples are a "provision still being considered, subject to further development." As reflected in Appendix H.II, Item II.F.2 (Amendment 57, dated May, 1984) of the Fermi 2 FSAR, two additional reports (SLI-8211, dated May, 1982; and SLI-8218, dated November, 1982) have been developed for BWROG. The BWROG has reviewed these reports and concludes that core thermocouples are not required for identification of inadequate core cooling. In addition, Detroit Edison to NRC letters EF2-65624 (dated September 23, 1983) and EF2-67230 (dated April 23, 1984) provide a plant-specific evaluation of Fermi 2's vessel level instrumentation which, similarly, concluded that the existing instrumentation is adequate.

Detroit Edison Comments

Detroit Edison letters to NRC EF2-72769, dated September 5, 1984, and EF2-72004, dated November 21, 1984, address these relief requests. These two letters revise or withdraw various relief requests as well as submitting two new requests. A supplemental SSER should address these requested revisions to the Fermi 2 Inservice Testing Program for pumps and valves.

Current SSER 4 Discussion:

"However, there are three specific matters for which we require the applicant to submit confirmatory information prior to fuel load. These are:

- a. Provide a summary report for our review prior to the fuel load, confirming that the values of valve acceleration are acceptable.
- b. Submit any remaining required SQRT forms for equipment qualified after the SQRT audit.
- c. Additionally, we require the applicant to submit justification for interim operation for any safety-related equipment which cannot be completely qualified prior to fuel load."

Detroit Edison Comments:

- a. Detroit Edison to NRC letter EF2-68287, dated June 22, 1984, confirmed the acceptability of valve accelerations in their as-built configuration for all but one valve. Edison committed in that letter to modify the valve (V11-2006) to support its seismic qualification.

Detroit Edison to NRC letter EF2-71997, dated November 20, 1984, confirmed that V11-2006 was modified and the valve now meets the applicable seismic qualification criteria.

- b. Detroit Edison to NRC letters EF2-68287 (dated June 22, 1984) and EF2-71997 provided supplemental SQRT forms.
- c. EF2-71997 stated that Fermi 2 would not submit any JIOs for seismic qualification concerns since Edison has submitted a SQRT form for all safety-related equipment to be installed at time of fuel load.

Current SSER 4 Discussion:

"However, the applicant later modified its commitment on this matter in its letter dated September 15, 1983...Accordingly, we find the revised SRV maintenance interval proposed by the applicant in its letter dated June 4, 1981, to be acceptable."

Detroit Edison Comments:

The proper reference in the second sentence quoted above is the September 15, 1983 (EF2-65232, Detroit Edison to NRC) letter.

Current SSER 4 Discussion:

"A manual hose station with enough hose to reach all areas in the facility is located in the truck-bay areas."

Detroit Edison Comments:

The referenced hose station can reach all but the asphalt storage room in the onsite storage facility. An additional hose reel is being installed to provide the hose length required to provide coverage for the asphalt storage room from the hose station in the truck bay. (FSAR Section 11B.2.2.4 will be revised to reflect this also.)

Current SSER 4 Discussion:

"Door openings to the radwaste building and the rooms housing the asphalt storage tank and pumps have Class A, three-hour rated fire doors."

"Three-hour rated fire barriers are provided for all areas to separate the radwaste storage facility from other areas of the Fermi 2 facility."

Detroit Edison Comments:

FSAR Section 11B.2.2.4 (Amendment 51, dated October, 1983) and FSAR Appendix E.5, Item 021.35 (Amendment 44, dated September, 1982), identify a few barriers not qualified to the three hour rating. The unqualified barriers and justification for their acceptability are delineated below.

1. The two conveyor openings to the radwaste building on the east wall are open. These openings, however, do not impose a significant communication hazard because the areas are cut off by a 26-foot concrete wall. Because these cubicles are the receiving area for the conveyor carrying the sealed drums to the facility, they contain only a minimum amount of combustibles.
2. The door opening to the access aisle is a nonrated metal door. However, the door leads to a corridor that is a low combustible area.

Current SSER 4 Discussion:

"Automatic sprinkler protection is provided for all areas of the facility except the building control room and the empty drum storage area."

Detroit Edison Comments:

FSAR Section 11B.2.2.4 (Amendment 51, dated October, 1983) and FSAR Appendix E.5, Item 021.35 (Amendment 44, dated September, 1982) indicate that the "office area and corridor" should be included in areas not covered by the automatic sprinkler system. As indicated in the referenced sections, the combustible loading in these areas does not justify a suppression system.

SSER 4 Section: 9.5.1

SSER 4 Page: 9-2

Current SSER 4 Discussion:

"Smoke detection capability is provided in all areas of the facility except for the radwaste storage areas."

Detroit Edison Comments:

FSAR Section 11B.2.2.4 (Amendment 51, dated October, 1983) indicates that the truck-bay area is also excluded from the coverage of the smoke detectors.

SSER 4 Section: 13.3

SSER 4 Page: 13-1 through 13-12

Detroit Edison Comments:

Several open issues identified in SSER 4 have been resolved in Revision 3A of the Radiological Emergency Response Plan which was transmitted to the NRC via EF2-72786, dated August 24, 1984.