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**Detroit
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January 26, 1985
NE-85-0233

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) Letter dated January 19, 1985, Request for
Exemption to Appendix J

Subject: Request for Exemption to Appendix J

This letter is intended to provide more complete justification for the request for exemption to 10CFR50, Appendix J originally submitted in Reference 2. Reference 2 requested exemption from Paragraph III.D.2(b)(ii), which states:

"Air locks opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such periods at not less than P_a ."

Whenever the plant is in Operational Condition 4 or 5, containment integrity is not required. Therefore, if an air lock is opened during either of these conditions the subject paragraph requires that an overall air lock leakage test be conducted prior to entry into Operational Condition 3. Such a test involves the following activities:

- o Installing 14 tie downs to the interior air lock door (4-6 hours)
- o Pressurizing the air lock to P_a (1 hour)
- o Waiting for the air lock volume to stabilize and recording the leakage (3 hours)
- o Depressurizing the air lock, removing and storing the tie downs below the air lock floor (3 hours).

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This test would require an average of 14 hours. Often there are minor problems that require containment entry just prior to entering Operational Condition 3. This would require an additional 14 hour test or personnel would be required to remain inside containment to perform such activities until entry is made into Operational Condition 3.

Paragraph III.D.2(b)(iii) of Appendix J allows the interior and exterior air lock door seals to be pressurized to P_a as a satisfactory method of assuring air lock integrity after being opened while in Operational Conditions requiring containment integrity. This test is much less time consuming (2 hours).

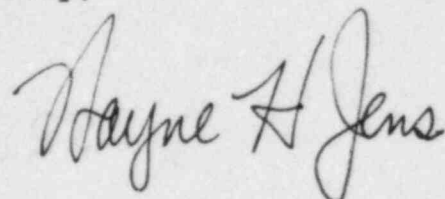
Therefore, Detroit Edison requests an exemption from paragraph III.D.2(b)(ii) and instead intends to demonstrate air lock leak tight integrity prior to entering Operational Condition 3 by verifying acceptable leakage after pressurizing the interior and exterior air lock door seals to not less than P_a . If, however, maintenance has been performed on the air lock since the last successful leakage test performed pursuant to III.D.2(b)(i), an air lock leakage test will be performed.

Detroit Edison also requests that the draft Fermi 2 Technical Specifications be changed as indicated in Attachment 1 to conform to the requested exemption.

I hereby certify that this proposed change to the Fermi 2 Technical Specifications as well as the changes requested in letters dated January 10 and January 22, 1985 respectively, accurately reflects the plant, the Final Safety Analysis Report and the staff's Safety Evaluation Reports in all material respects, except as necessitated by the above discussed change.

Should you have any further questions, please contact Mr. O. Keener Earle (313) 586-4211.

Sincerely,



cc: Mr. P. M. Byron
Mr. M. D. Lynch
Mr. L. N. Olshan
Document Control Desk, USNRC
Washington, D. C. 20555

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each primary containment air lock shall be demonstrated OPERABLE:

a. Within 72 hours following each closing, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying seal leakage rate less than or equal to 5 scf per hour when the gap between the door seals is pressurized to P_a , 56.5 psig.

b. By conducting an overall air lock leakage test at P_a , 56.5 psig, and
c. by verifying that the overall air lock leakage rate is within its limit:

1. Prior to initial fuel loading and at 6-month* intervals thereafter,

2. Prior to establishing PRIMARY CONTAINMENT INTEGRITY when the air lock ~~is~~ ^{has been} opened during periods when containment integrity was not required ^{if maintenance which could affect the leak tight integrity of the doors has been performed since the last successful test pursuant to 4.6.1.3.C.1.}

c. At least once per 6 months by verifying that only one door in each
d. air lock can be opened at a time.**

b. Prior to establishing PRIMARY CONTAINMENT INTEGRITY if the air lock has been opened during periods when containment integrity was NOT REQUIRED. The demonstration shall verify a SEAL LEAKAGE RATE LESS THAN OR EQUAL TO 5 scf PER HOUR WHEN THE GAP BETWEEN THE DOOR SEALS IS PRESSURIZED TO P_a , 56.5 psig UNLESS THE AIR LOCK IS TESTED PURSUANT TO 4.6.1.3.C.2 INSTEAD.

*The provisions of Specification 4.0.2 are not applicable.

**Except that the inner door need not be opened to verify interlock OPERABILITY when the primary containment is inerted, provided that the inner door interlock is tested within 8 hours after the primary containment has been deinerted.