

Wayne H. Jens
Vice President
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DMB

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October 8, 1984
EF2-70026

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, W. H. Jens to J. G. Keppler,
September 10, 1984, EF2-69705

Subject: Final Evaluation of 10CFR50.55(e) Item 134
"Design Deficiency in Use of Bent Conduit"

Detroit Edison has completed its investigation of Item 134, "Design Deficiency in Use of Bent Conduit" and has determined it is not reportable under 10CFR50.55(e). Item 134 was originally reported as a potential deficiency on August 9, 1984, and was subsequently documented in Reference (2).

Specification 3071-128, Standards ED-1-1-8.26 and ED-2-3-4.2 specify criteria for the allowable length of spans containing combinations of rigid and flexible electrical conduit. Giffels Associates, Inc. prepared these standards for Edison approval via Design Change Notice DCN-10513; however, the use of bent rigid conduit was not considered during the development of the standards.

This deficiency was discovered by Edison Field Engineering during a review of the structural acceptance of a particular conduit span of length in excess of the allowable permitted by Specification 3071-128. This span had a bent rigid conduit section and a flexible conduit section. Field Engineering determined that the unistrut clamp at the rigid conduit must resist torsional slip caused by twisting of the conduit at the clamp if the conduit is to be considered seismically acceptable. The unistrut clamp's resistance to torsional slip was not documented when the specification was developed.

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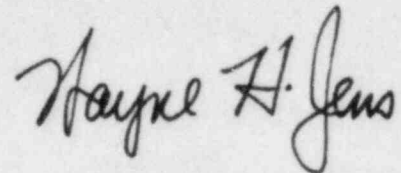
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The Detroit Edison Engineering Research Department tested three conduit strap assembly samples for each of the ten conduit sizes in use at Fermi 2. The torque value at which torsional slip of the conduit through the strap occurred was determined.

Giffels Associates Inc. used this data to review spans of combined bent rigid and flexible conduit as allowed by Specification 3071-128. Detroit Edison determined from this evaluation that no revision to the specification or re-work of installed conduit is required. Therefore, Item 134 is not reportable under 10CFR50.55(e).

This is Detroit Edison's final report of Item 134. If you have questions concerning this matter, please contact Mr. Lewis Bregni, (313) 586-5083.

Sincerely,

A handwritten signature in black ink, reading "Wayne H. Jens". The signature is written in a cursive style with a large, prominent initial "W".

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