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JHB

February 7, 1985
EF2-70383

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Letter, D. A. Wells to J. G. Keppler, October 20, 1983, EF2-65288

(3) Letter, D. A. Wells to J. G. Keppler, December 22, 1983, EF2-66490

(4) Letter, W. H. Jens to J. G. Keppler, May 11, 1984, EF2-68541.

(5) Letter, W. H. Jens to J. G. Keppler August 27, 1984, EF2-69279

Subject: Supplemental Report of 10CFR50.55(e) Item 101 "Debris in Piping Systems"

This letter supplements Detroit Edison's report of 10CFR50.55(e) Item 101, "Debris in Piping Systems" (Reference 5). On January 14, 1985, Detroit Edison's Mr. J. E. Conen telephoned Mr. R. C. Knop of NRC Region III and informed him of the discovery of debris in the instrument volume of the north scram discharge header. This letter documents that Detroit Edison has taken corrective action in accordance with commitments in Reference 5, Final Report of 10CFR50.55(e) Item 101, "Debris in Piping Systems."



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Description of Deficiency

During leak rate testing of the scram discharge system, the upstream isolation valve for the instrument volume drain line leaked past the seat. When the valve was opened for repairs, a flashlight switch was found lodged in the valve seat. The Deviation/Event Report written to investigate this discrepancy included the requirement to radiograph the bottoms of the north and south scram discharge instrument volumes. A flashlight and pneumatic grinder were discovered in the north instrument volume.

Detroit Edison has concluded that the flashlight and grinder were left in the scram discharge system piping during construction. The 8 inch scram discharge headers which dump into the instrument volumes were hydro-lased as part of the CRD system flushing program. The scram discharge piping configuration is such that a velocity flush of the instrument volume is not possible as the 12 inch diameter instrument volume is drained by a 2 inch drain line. Hydro-lasing the 8 inch scram discharge header would have pushed debris into the instrument volume where, depending on its size, it would remain and/or be removed when the instrument volume is drained.

Analysis of Safety Implications

Debris remaining in safety related piping systems could result in the affected system not performing its intended function. The safety analysis performed for the items found in the SDV Instrument Volume concluded that there was no potential for degradation of the function of the Control Rod Drive System.

Corrective Action

As a result of finding the flashlight parts in the drain valve the following actions were taken:

- The bottom sections of both instrument volumes were radiographed to determine if there was debris in either instrument volume. This resulted in finding a flashlight and grinder in the north instrument volume. Both items have been removed.

- The inside of 8 inch scram discharge header piping was inspected using a TV camera. The piping was clean and there was no debris in the pipe.

- The 2 inch drain piping was radiographed at points of restriction (elbows) and no debris was found.

- Detroit Edison has performed a safety analysis of this deviation and has concluded that these items would not interfere with the operation of the CRD System or prevent the isolation of the instrument volume drain lines. Therefore, no safety significance is attributed to this event.

If you have questions concerning this matter, please contact Mr. Lewis Bregni, (313) 586-5083.

Sincerely,

Wayne H. Jens

cc: P. M. Byron
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