

Douglas R. Gipson
Senior Vice President
Nuclear Generation

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Detroit
Edison

April 18, 1996
NRC-96-0045

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) LER 93-003-03 dated March 17, 1995 (NRC-95-0015)
 - 3) LER 95-007 dated October 27, 1995 (NRC-95-0109)
 - 4) Generic Letter 96-01 dated January 10, 1996
 - 5) Letter NRC to Alexander Marion, Nuclear Energy Institute,
dated February 14, 1996

Subject: Detroit Edison Response to NRC Generic Letter 96-01

Reference 4 requested a written response within 60 days indicating whether or not Detroit Edison intends to perform a requested comparison of schematic and logic diagrams against plant surveillance procedures to ensure that all portions of the logic circuitry (as discussed in Reference 4) are adequately covered in the surveillance procedures. Reference 5 extended the response date to April 18, 1996 (30 days subsequent to the NEI workshop on the subject Generic Letter).

As discussed in References 2 and 3, Detroit Edison has recently performed extensive comparisons between schematic diagrams and plant surveillance procedures. In addition to these reviews, Detroit Edison has also conducted periodic reviews of I & C surveillance overlap drawings approximately every three years to confirm the completeness and continued adequacy of I & C test procedures. Detroit Edison believes that these comparisons encompass the comparison requested by the NRC

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and that requested actions (1) and (2) of the Generic Letter have therefore been completed.

The Generic Letter acknowledged that licensees may have already performed the requested reviews. For these licensees, the Generic Letter suggested that modifications made to these logic circuits be reviewed. Detroit Edison is evaluating the extent that plant modifications (completed after the procedure reviews described above) require additional review to ensure that affected portions of the logic remain adequately covered by surveillance procedures and that test overlap between procedures has been maintained. Detroit Edison is also evaluating the extent to which procedure changes unrelated to modifications may have had an impact on the overlap and thus the overall adequacy of the procedures.

It is not expected that the proposed evaluations will result in the need for changes to surveillance procedures beyond the changes already discussed in References 2 and 3. Nonetheless, these evaluations and any necessary changes to surveillance procedures will be completed prior to startup from the first refueling outage commencing after January 10, 1997, as requested by the Generic Letter. Detroit Edison is also evaluating surveillance program controls to maintain on-going compliance with the requirements.

The following commitments are made in this letter:

1. Complete the scheduled three year review of I&C overlap drawings. This review evaluates the extent that plant modifications and procedure changes have affected the I&C overlap drawings and ensures the affected portions of the logic remain adequately covered by surveillance procedures.
2. Complete these evaluations and any necessary changes to surveillance procedures prior to startup from the first refueling outage commencing after January 10, 1997.
3. Evaluate existing administrative controls for plant design modifications and procedure revisions. Implement changes to these controls as necessary to ensure that the quality of procedures including test overlap is maintained during the changes.

• USNRC

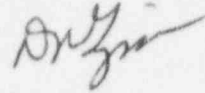
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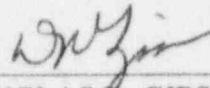
Should you have any questions regarding this response, please contact Mr. Joseph Conen at (313) 586-1960.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Conen", written in a cursive style.

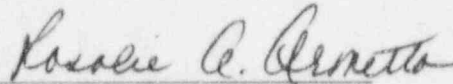
cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel

I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



DOUGLAS R. GIPSON
Senior Vice President

On this 18th day of April, 1996 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

ROSALIE A. ARMETTA
NOTARY PUBLIC - MONROE COUNTY, MI
MY COMMISSION EXPIRES 10/11/99