

Appendix

NOTICE OF DEVIATION

Detroit Edison Company

Docket No. 50-341

Based on the results of the NRC inspection conducted on October 29-31, November 1, 2, 14-16, 26-30, 1984, and January 22-25, 1985, certain of your activities deviate from your commitments to the commission which have safety significance as indicated below:

1. Section 9.5.1.2.1. of the FSAR dated March, 1984, states in part, "...multipurpose 30-pound portable dry chemical extinguishers for Class A, B, and C fires,...are distributed throughout all the floors of the reactor, auxiliary, RHR, turbine, and radwaste buildings." The UL classification rating of the 30-pound dry chemical extinguishers is 20A:80B:C.

Contrary to the above, during a plant tour on November 26, 1984, the inspectors observed that 10-pound portable fire extinguishers for Class A, B, and C fires with a UL classification rating of 10A:60B:C were installed throughout the plant. A comparison of the two extinguishers extinguishing effectiveness indicated that the 10 pound extinguishers have a fifty percent reduction in extinguishing effectiveness on Class A (ordinary combustibles) fires and a twenty-five percent reduction in extinguishing effectiveness on Class B (flammable gases and liquids) fires.

2. Section 9B.2.2.5. of the FSAR discusses the fire protection layout drawings stating in part, "the drawings show each safety related building...the required shutdown equipment found within each building and fire detection...equipment." Figure 9B.4 of the FSAR indicated that a fire detector was located on the first floor ceiling of the reactor building in the personnel hatch interlock area.

Section 9B.1.2. of the FSAR states in part, "the following National Fire Protection Association (NFPA) codes were used for guidance in the development of the Fermi 2 fire protection program...including NFPA 72D-1975 and NFPA 72E-1974." Section 8-1.1.2 of NFPA 72E-1974 states that an air duct smoke detector installation shall not be used as a substitute for open area protection. Section 4-3.1 of NFPA 72E requires spot-type smoke detectors to (shall) be located on the ceiling not less than six inches from a sidewall.

Contrary to the above, while performing a plant tour on November 26, 1984, the inspectors were unable to locate any fire detectors on the first floor ceiling (EL. 583'6") of the reactor building in the personnel hatch interlock area as identified in figure 9B.4. of the FSAR. During the inspection, the licensee determined the fire detector for this area was located outside the physical boundaries of the room at the exhaust of the return duct for the area.

With respect to item 1 the inspection showed that action had been taken to correct the identified deviation and to prevent recurrence. Consequently, no reply to this deviation is required and we have no further questions regarding this matter at this time.

Regarding the remaining item, please advise us in writing within thirty days of the date of this letter of the corrective actions you have taken or plan to take, show the estimated date of completion with regard to these deviations.

2/15/85
Dated

R. L. Spessard
R. L. Spessard, Director
Division of Reactor Safety