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January 19, 1985
NE-85-0046

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: Fermi 2
NRC Docket No. 50-341

Subject: Request for Exemption to Appendix J

Detroit Edison hereby requests exemption for Fermi 2 from 10CFR50, Appendix J, 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 5 (Refueling) or Operational Condition 4 (Cold Shutdown), containment integrity is not required. Therefore, if an air lock is opened during Operational Condition 4, paragraph III.D.2(b)(ii) requires that an overall air lock leakage test at not less than P_a be conducted prior to entry into Operational Condition 3 (Hot Shutdown).

This requirement is excessively restrictive since it requires a termination of containment entries while preparing to leave Operational Condition 4, until the air lock that was operated while in Operational Condition 4 or 5 is tested per III.D.2(b)(ii). This requirement would apply even if the six (6) month testing required by Paragraph III.D.2(b)(i) had been satisfied. Subsequent containment entries while in Operational Condition 4 would require the retesting of the air lock utilized. [Access to containment in Operational Condition 3 is governed by III.D.2(b)(iii).] To perform the III.D.2(b)(ii) test, either the containment would have to be cleared of personnel, or personnel would be required to remain inside the containment during both the

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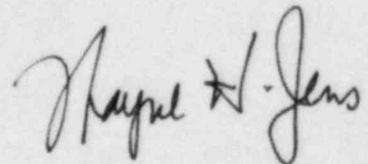
air lock test and ascension to Operational Condition 3 [when Paragraph III.D.2(b)(ii) would no longer apply]. Often there are several minor operational and maintenance problems that require containment entry just prior to entering Operational Condition 3; the air lock test required by III.D.2(b)(ii) would have to wait until all problems requiring containment entry were first corrected. This would slow the process of returning to operation.

If the periodic 6-month test of paragraph III.D.2(b)(i) and the test required by paragraph III.D.2(b)(iii) are current, no maintenance has been performed on the air lock, and the air lock is properly sealed, there should be no reason to expect the air lock to leak excessively just because it has been opened in Operational Condition 4 or Operational Condition 5.

Therefore, permission is requested to substitute the seal leakage test of paragraph III.D.2(b)(iii) for paragraph III.D.2(b)(ii) when no maintenance has been performed on the air lock.

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

Sincerely,



cc: Mr. P. M. Byron
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