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January 7, 1988  
NRC-87-0231

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

- References: (1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
- (2) Notice of Violation (NRC Inspection Report No. 50-341/87039) dated December 8, 1987

Subject: Response to a Notice of Violation

Detroit Edison's response to reference 2 entitled " Response to NRC Inspection Report 87039" is attached. This response addresses the two violations identified in reference 2 which were discovered during a special equipment qualification (EQ) safety inspection.

As noted in the response, Detroit Edison maintains that the EQ files, as reviewed during the inspection, provided documented evidence of the qualification. The additional information provided is considered clarification of the contents.

As shown by the results of this NRC inspection, the methodology and procedures used by Detroit Edison to document compliance with the appropriate environmental qualification requirements are sound. This program, as shown by the overall results in the subject inspection report, reflects the serious commitment made on the part of Detroit Edison's management to achieve compliance with 10 CFR 50.49.

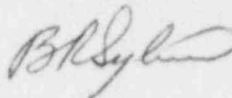
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If you have any questions, I will be pleased to discuss them  
with you at your convenience.

Sincerely,



B. R. Sylvia  
Group Vice President

cc: A. B. Davis  
E. G. Greenman  
W. G. Rogers  
J. J. Stefano

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/87039

Statement Of Violation 87039

10 CFR 50.49 requires that electrical equipment important to safety be environmentally qualified. This qualification was to be completed by November 30, 1985 as stated in License Condition 2.C.(6).

The subject inspection report identified two items considered to be in violation of 10 CFR 50.49.

1. "The EQ (equipment qualification) file (EQ1-EF2-101) for Weidmuller Terminal Blocks did not demonstrate the environmental qualification of these blocks for accident conditions inside the drywell, in that the test documentation in the file could not justify the failures experienced by the terminal blocks under spray conditions. Subsequent to the finding, the licensee provided new documentation to provide evidence that the terminal blocks were qualifiable; however, this evidence was not contained in the EQ files prior to the EQ deadline of November 30, 1985."

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The Franklin Institute test report for the Weidmuller terminal blocks contained in EQ File EQ1-EF2-101 at the time of the NRC inspection, provided an evaluation of the failures experienced during LOCA testing under spray conditions. This evaluation attributed the failures to the interconnecting wiring connected to the terminal blocks within the test vessel. It also indicated that the applied voltage on the terminal blocks was increased from 150V ac to 600V ac further into the LOCA test, thus limiting the failure to environmental conditions within the terminal block enclosure resulting from the initiation of spray. This evaluation was further supported by a Weidmuller letter dated December 17, 1984 which was also contained in the EQ file.

During the site inspection, DECO was requested to identify the specific applications of these terminal blocks at Fermi 2 in 480V ac circuits inside the drywell along with an evaluation of the potential consequences of terminal block failure during and after initiation of containment spray. In addition, DECO was requested to provide the specific leakage currents measured during the LOCA test particularly during the spray initiations to the NRC. All requested information was provided in October 1987. In conclusion, it is Detroit Edison's opinion that all the additional data provided to the NRC was for clarification of the qualification documentation already existing in the EQ Central File and not new documentation.

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2. "The EQ file (EQ-EF2-220) for AVCO solenoid valves did not demonstrate operability of the valves under accident conditions, in that the valve assemblies failed during functional testing by "sticking" in an intermediate position. Subsequent to this finding, the licensee provided new evidence that the assemblies were qualifiable; however, this evidence was not contained in the EQ files prior to the EQ deadline of November 30, 1985."

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The anomalies experienced in the test documentation were evaluated and a conclusion was drawn as to the anomalies effect on the qualification of the main steam isolation valve manifold assembly. This test documentation along with the anomaly evaluation and conclusions were contained in the EQ file prior to the time of the audit. However, the NRC inspector did not consider the evaluation to be sufficient in order to support the conclusions reached. Additional clarifying information was then presented which further supported the original conclusions arrived at in the EQ file. Detroit Edison understands that the inspector then concurred that the AVCO solenoid valves were qualifiable. Therefore, it is Detroit Edison's opinion that the additional data presented to the NRC was to clarify the original test anomaly evaluation and the conclusions already contained in the EQ file.

Action Taken and Results Achieved:

The additional clarifying information supplied to the inspector was sufficient to resolve the inspector's concerns.

Actions To Be Taken to Avoid Further Violations:

The EQ files will be revised by February 1, 1988 to include the clarifying information.

No corrective measures are required to avoid further violations except for those already described. The methods and procedures used by Detroit Edison to document compliance with appropriate environmental qualification requirements are sound, as demonstrated by the overall results of this EQ inspection. These specific concerns are not considered to be programmatic in nature.