

DCD

APR 19 1988

Docket No. 50-341

CAL-RIII-88-009

The Detroit Edison Company
ATTN: B. Ralph Sylvia
Group Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Dear Mr. Sylvia:

This letter confirms the telephone conversation between E. G. Greenman of this office and you on April 19, 1988, covering recent problems that have occurred at the Fermi facility.

On April 9, 1988, an ESF actuation occurred wherein the Residual Heat Removal (RHR) system inboard injection valve, E11-F015B, inadvertently isolated with no operator action and no apparent actuation signal. Without the attendant isolation of the in service shutdown cooling RHR pump suction valve, the "D" RHR pump ran deadheaded for a period of 33 minutes. With regard to this matter we understand that you are:

1. Troubleshooting the RHR system to determine the root cause of the inadvertent isolation of valve E11-F015B and formulating and implementing corrective action to prevent recurrence.
2. Performing an engineering evaluation and appropriate pump testing to determine whether the "D" RHR pump suffered any damage as a result of running deadheaded for 33 minutes and possible long term deleterious effects.
3. Providing us your rationale for declaring the "D" RHR pump operable, both before and after the event.

With regard to the Moisture Separator Reheaters (MSRs) previously found damaged and being repaired during the current outage, we understand that you are:

1. Performing an engineering analysis to determine the effect of the stub tubes and other debris remaining in the reactor primary and balance of plant systems including the reactor core.
2. Installing strainers in the Flash Tanks and revising plant procedures to require that flow be aligned through the reactor feed pump suction strainers whenever the startup level control valve is to be used.

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3. Obtaining a sample of reactor coolant from the lower reactor head drain line and analyzing it microscopically for the presence of stainless steel wool and chemically for iron, nickel and chromium.
4. Implementing a pipe inspection program which includes opening piping at strategic locations and inventorying the debris collected in those piping systems that are the suspected flow paths of the stub tubes and MSR debris. Also, rationale has been provided for those sections of piping not inspected as part of this program.
5. In addition to the above actions that you are already taking, we understand that you will:
 - a. Implement a flushing program consisting of a long cycle flush and heater drain piping flushes back to the condenser during startup and power ascension from the current outage.
 - b. Establish a weekly interval for future sampling and analysis of the reactor coolant as in 3., above.
 - c. After startup from the current outage, and operation for some period of time at elevated power levels, open and inspect the MSRs, reactor feed pump suction strainers, and Flash Tank strainers for stub tubes, damage, degradation and debris at the first opportunity provided by the unit being in cold shutdown and of sufficient duration to allow the inspections to be performed. All subsequent cold shutdowns of sufficient duration will entail an inspection of the reactor feed pump suction strainers and the Flash Tank strainers. Once detected all stub tubes and debris shall be removed.

In addition to the issues discussed above with the MSR and the "D" RHR pump, other operational problems related to human performance have continued to occur even though you have implemented programs to prevent such occurrences. We understand that you will evaluate the effectiveness of these programs, especially as they relate to the adequacy of administrative controls and adherence to these controls by the line organizations, and provide your written assessment to this office.

It is our understanding that you will make available the results of these activities for our review. We further understand that startup of Fermi-2 will only occur with the concurrence of the Regional Administrator or his designee. Issuance of this Confirmatory Action Letter does not preclude the issuance of an order requiring implementation of the above requirements.

None of the actions specified herein should be construed to take precedence over actions which you feel are necessary to ensure plant and personnel safety.

APR 19 1988

Please advise me immediately if your understanding differs from that set forth above.

Sincerely,

Original signed by
A. Bert Davis

A. Bert Davis
Regional Administrator

- cc: Patricia Anthony, Licensing
- P. A. Marquardt, Corporate
Legal Department
- DCD/DCB (RIDS)
- Licensing Fee Management Branch
- Resident Inspector, RIII
- Ronald Callen, Michigan
Public Service Commission
- Harry H. Voight, Esq.
Michigan Department of
Public Health
- Monroe County Office of
Civil Preparedness
- M. Johnson, EDO
- W. Lanning, NRR
- F. Miraglia, NRR
- G. Holahan, NRR
- T. Quay, NRR
- J. Strasma, RIII
- J. Lieberman, OE
- L. Chandler, OGC

YES
RIII
WMC
Cooper/pb
4/13/88

RIII *yes*
ack
Knop
4/13/88

yes
RIII
Sh
Grobe
4/18/88

RIII
SA
Greenman
4/18/88

NRR
WMC For
Crutchfield
4/19/88
PCA
TELECON

RIII
CJP
Paperiello
4/19/88

RIII
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Davis
4/19/88