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April 24, 1986  
VP-86-0046

Director of Nuclear Reactor Regulation  
Ms. Elinor G. Adensam, Director  
Project Directorate No. 3  
Division of BWR Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Ms. Adensam:

- Reference: 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
- 2) Detroit Edison Letter to NRC, "Inservice  
Testing of Pumps and Valves", EF2-65368,  
dated October 4, 1983

Subject: Relief Request VR-51 to Inservice  
Testing Program for Pumps and Valves

In accordance with 10CFR50.55a(g)(5)(iii), Detroit Edison is providing the enclosed relief request for incorporation into Revision 2 of the Inservice Testing Program for Pumps and Valves (Reference 2). The enclosed Relief Request VR-51 provides a revision to the testing requirements for the MSIV-Leakage Control System isolation valves to allow valve cycling and timing during cold shutdowns in lieu of quarterly testing as previously specified.

Please direct any questions to Mr. R. L. Woolley at  
(313) 586-4211.

Sincerely,

\* With attachment

cc: Mr. M. D. Lynch \*  
Mr. J. Page \*  
Resident NRC Inspector \*  
USNRC Document Control Desk  
Washington, D.C. 20555

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RELIEF REQUEST VR-51

SYSTEM: MSIV Leakage Control  
COMPONENT: B21-F434 (V5-2294) & B21-F437 (V5-2297)  
CATEGORY: B21-F434 (Category - A) & B21-F437  
(Category - B)  
FUNCTION: Inboard Containment Isolation Valve

TEST REQUIREMENT: Exercise and time valves every three months to the open and closed position. (BT-0 & BT-C)

BASIS FOR RELIEF: The MSIV Leakage Control (MSIV-LCS) System is not designed to operate at pressures greater than 50 psig. This is based on the fact that this system is only required to operate in a post-LOCA environment after the primary system has been depressurized (i.e., primary system pressure is less than 50 psig). Cycling of these valves during normal operation, with the primary system at rated pressure introduces the potential for over-pressurizing the MSIV-LCS. The alternate testing criterion delineated below will provide functional testing at pressures equivalent to those for which the system is designed to operate.

ALTERNATE TESTING: These valves will be full stroked, exercised and timed during cold shutdown.