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June 13, 1988
NRC-88-0150

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) Detroit Edison letter to the NRC, NRC-87-0177 dated January 26, 1988

(3) Detroit Edison letter to the NRC, NRC-88-0002, dated January 15, 1988

(4) Notice of Violation (NRC Inspection Report 50-341/87021) dated May 12, 1988

Subject: Response to a Notice of Violation

Attached is Detroit Edison's response to reference 4. This violation was issued for activities viewed as contrary to the requirements 10CFR50.59. These activities were discussed in an Enforcement Conference on December 22, 1987. At that time, it was agreed that Detroit Edison would submit a written position. This was accomplished by reference 3.

For further information, please contact Patricia Anthony at (313) 586-1617.

Sincerely,

B Ralph Sylvia

cc: A. B. Davis
K. C. Knop
T. R. Quay
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RESPONSE TO NRC INSPECTION REPORT NO. 50-341/87021

Description of the Violation:

Main Steam Reheater (MSR) Issue:

On April 9, 1987, a steam leak occurred off the MSRs while at 30% reactor power. To effect the necessary repairs, OSRO approved a deviation from Technical Specification Interpretation No. TS-87-027 at 0900 that same day to allow the plant to continue operating at 30% power without MSRs in service. This was based upon the GE correspondence of February 26 and March 11, 1987 (submitted as Exhibit F in reference 3). At 1222 the MSRs were removed from service and returned to service at 1342 the same day after the leak was repaired.

Later in the day on April 9, 1987, the NRC resident inspector became aware that power had not been reduced below 25% power when the MSRs were isolated, consistent with Technical Specification Interpretation No. TS-87-027. Detroit Edison was questioned as to the appropriateness of this action. Within the next 24 hours, the Technical Engineer stated that the action was based on the following:

a. Actual CPR on the day in question was in excess of 3.0.

b. The GE letter of March 11, 1987 stated that the present plant conditions would not result in exceeding the present Technical Specification limits.

c. Reactor protection system setpoints were less than 100%.

The NRC resident inspector questioned whether a safety evaluation was performed for this situation. The individual stated that no formal safety evaluation had been performed, but the situation and actions had been reviewed and determined to be acceptable by OSRO.

Feedwater Issue:

During the first two weeks of March and April 1987, plant operations were conducted with partial feedwater heating. Reactor power levels were increased to 50% during a portion of this time period. The significant period was March 8-12, 1987 when power was 50% and feedwater temperature to the reactor vessel was 160 degrees Fahrenheit. During plant startup in the first week of March, significant problems had been encountered with the feedwater heater system and feedwater heating was not accomplished as normally expected.

Engineering personnel reviewed the situation and determined that FSAR Section 15.1.1.1.1 bounded the situation. To further confirm that this situation posed no adverse conditions, a conference call took place on March 13, 1987, with G.E. on the potential ramifications of operation in this manner. The conversation concluded that operation in this manner was not inconsistent with G.E. documentation, but no specific analysis had been performed at 50% power and feedwater temperature below 220 degrees.

In a letter dated April 14, 1987 (TDEC-5535), G.E. provided the conclusions of an analysis fairly consistent with plant operations between March 8 and March 12, 1987.

The NRC resident inspector upon reviewing the information pertaining to operation of the plant with reduced feedwater temperature questioned whether a 50.59 safety evaluation was required.

Corrective Actions Taken and Results Achieved

MSR Issue:

On April 16, 1987, Detroit Edison prepared safety evaluation 87-0114 Rev. 0 for taking the MSRs out of service following its internal procedure. This safety evaluation documented that an unreviewed safety question did not exist. The safety evaluation was reviewed and approved by OSRO.

In reference 2, Detroit Edison submitted a proposed change to Technical Specification Table 3.2.3-1 curves in order to allow the MSRs to be taken out of service.

Feedwater Issue:

Formal evaluations of the ramifications of operating with reduced feedwater temperatures have been performed. Safety evaluations 87-0365 (for operation above 50% reactor power) and 87-0390 (for operation at greater than 75% reactor power) were performed in accordance with approved procedures. These safety evaluations were reviewed and approved by OSRO. The results have been incorporated into the Updated Final Safety Analysis Report submitted in March of 1988.

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/87021

Corrective Actions Taken to Avoid Further Violation

The new procedure FIO-FMP-01, "Safety Review Group Organizations" lists the OSRO responsibilities. Included in the responsibilities is the requirement that OSRO shall ensure that a preliminary evaluation has been performed, and if required, a 10CFR50.59 safety evaluation for any proposed off-normal plant operation it reviews. This procedure was approved in June of 1988.

Moreover, the safety evaluation program has been generally strengthened since these events occurred. Training requirements for personnel performing 10CFR50.59 preliminary evaluations and full safety evaluations have been instituted as part of NOIP 11.000.53, revision 5, this procedure was approved June 3, 1988.

Date When Full Compliance Will Be Achieved

Detroit Edison has been in full compliance since the approval of FIO-FMP-01 on June 3, 1988.