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July 15, 1986
VP-86-0094

Office of Nuclear Reactor Regulation
Attention: 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 to NRC Letter, "Request for an Emergency Amendment to the Fermi 2 Technical Specifications Governing Emergency Core Cooling System Actuation Instrumentation Setpoints", VP-86-0065, dated June 11, 1986
 - 3) Detroit Edison to NRC Letter, "Request for Exigent amendment to the Fermi 2 Technical Specifications Governing ECCS Actuation Instrumentation Setpoints," VP-86-0076, dated July 2, 1986
 - 4) NRC to Detroit Edison Letter, "DECO Request for an Emergency Amendment to the Fermi 2 Technical Specifications Regarding the Degraded Grid voltage Setpoints", dated June 13, 1986 to F. E. Agosti from Robert M. Bernero
 - 5) NRC to Detroit Edison Letter, dated June 13, 1986 to F. E. Agosti from J. G. Keppler

Subject: Basis for Exigent Processing of the Amendment to the Fermi 2 Technical Specifications Governing ECCS Actuation Instrumentation Setpoints

Attachment 3 to Reference 3 outlined a chronology of events leading to a formal request for an exigent amendment to the Fermi 2 Technical Specifications.

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In accordance with 10CFR50.91(6)(iv), the following explains the reasons for the exigency and why Detroit Edison could not avoid it.

On May 27, 1986 a potential undervoltage condition was identified during the calculational update program at Fermi 2. Subsequent analysis and verification of vendor supplied motor operator voltage tolerances confirmed the inability of some Division I emergency equipment to operate commensurate with the current trip setpoint. Upon confirmation of the discrepancy, a Deviation Event Report (DER) was written and the NRC was informed of the condition in accordance with 10CFR50.72.

On June 7, 1986 Detroit Edison notified NRR of its intention to request an Emergency Amendment to the Fermi 2 Technical Specifications to preclude impacting the planned restart of the plant. The formal Emergency request was submitted on June 11, 1986, and docketed on June 12, 1986.

On June 13, 1986 Detroit Edison received Reference 4 which rejected the request for an emergency amendment to the Technical Specifications but granted relief from restrictions on operations for a limited time pending a more detailed proposal. Reference 4 permitted continuation of required outage activities and alleviated the immediate need which necessitated the request for an emergency Amendment. Acquisition of the requisite information to support a meeting, as requested in Reference 4, and subsequent submittal of a revised request for amendment began immediately. A meeting was scheduled for June 19, 1986 with NRR.

On June 17, 1986 Detroit Edison received a telefax of Reference 5 and learned, for the first time, that the relief was restricted to modes 4 and 5. Due to the impact on the planned restart, Detroit Edison verbally informed NRR of its intent to file a request for an exigent amendment to modify the Fermi 2 Technical Specifications following the June 19 meeting.

The technical basis for the proposed changes was thoroughly discussed on June 19, 1986 in the Bethesda office with Messrs. M. D. Lynch and A. Marinos. During that meeting Mr. Marinos indicated that Detroit Edison must provide documentation to support the equipment tolerances used in the design calculations and provide detailed assurance that the proposed 95% trip setpoint would not increase the number of diesel generator challenges.

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In response to Mr. Marinos request Detroit Edison initiated efforts to verify the voltage tolerances supplied by Limitorque. The valve motor operators, which are the limiting pieces of equipment, were purchased in 1972. The efforts expended to satisfy these additional requests for information proved more time consuming than originally expected. In addition to reviewing the procurement history, Detroit Edison interviewed the author of the calculation to establish the basis for the assumptions made therein. Also in response to Mr. Marino's request, Detroit Edison researched the historical stability of the 120Kv grid.

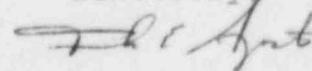
The information was analyzed by Detroit Edison's engineering department to verify the acceptability of the 95% trip setpoint and the accuracy of the degraded grid voltage trip setpoint calculations. This effort culminated in the writing of a thorough and complete request for an exigent Technical Specification amendment (Reference 3). This request was then reviewed by the onsite review organization and the Nuclear Safety Review Group as required by the Technical Specifications.

In conclusion, Detroit Edison has expended significant resources to expeditiously and thoroughly respond to NRC requests for informations and to ensure that the proposed Technical Specification amendment will protect the health and safety of the public and allow for the safe and efficient operation of Fermi 2. Furthermore, even if Detroit Edison had issued its request through the normal process immediately following the rejection of the Emergency Technical Specification request, and assuming the time intervals described in Generic Letter 86-03, the planned reactor restart would have been impacted.

Detroit Edison believes that it has applied for this license amendment in a timely fashion, that it could not have avoided this situation and that it has not created this exigent condition.

If you have any further questions concerning this matter, please contact Mr. F. H. Sondgeroth at (313) 586-4203.

Sincerely,



cc: Mr. M. D. Lynch
Mr. W. G. Rogers
USNRC Document Control Desk
Washington, D.C. 20555