

Fermi 2
6400 North Dixie Hwy., Newport, Michigan 48166
Tel: 734.586.5201 Fax: 734.586.4172

Detroit Edison



November 10, 1999
NRC-99-0098

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison's Letter to the NRC,
"Submittal of Relief Requests for the
Containment Inservice Examination Program",
NRC-99-0081, dated September 17, 1999

Subject: Supplemental Information for Containment Inservice
Examination Requests for Relief CISI-003 and CISI-004,
and Withdrawal of Request for Relief CISI-005

In Reference 2, Detroit Edison submitted eight Requests for Relief for the Containment Inservice Examination Program at Fermi 2 for NRC review and approval.

The enclosure to this letter provides supplemental information in response to a telephone conversation between Detroit Edison and the NRC staff on October 27, 1999. The enclosure contains the requested information regarding the Fermi 2 Containment Protective Coating Program to aid in NRC's review of Requests for Relief CISI-003, "Preservice of Reapplied Paint or Coatings," and CISI-004, "VT Prior to Paint or Coating Removal."

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Additionally, after further review of the ASME Code requirements, Request for Relief CISI-005, "VT-2 After Repair, Replacement or Modification," is hereby withdrawn.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,



Enclosure

cc: A. J. Kugler
A. Vogel
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

Containment Protective Coating Program

The Fermi 2 Containment Protective Coating Program is comprised of Detroit Edison Design Specifications 3071-359 and 3071-360, and inspection procedures 37.425.001 and 34.144.001, for the drywell and torus respectively. The Design Specifications provide the requirements for surface preparation, application, quality standards and materials to be used. The two surveillance procedures provide inspection requirements for the coating in the drywell and torus. Additional site specific contractor procedures are generated for task specific activities such as torus coating application and repair.

The following is a summary description of the containment coating program requirements:

The coating on the interior surfaces of the drywell and torus is considered nuclear safety related. Coating application and inspection activities are performed in accordance with the NRC approved Fermi 2, 10 CFR 50, Appendix B Quality Assurance Program. UFSAR Appendix A, "Conformance with Regulatory Guides" describes Fermi's compliance with NRC Regulatory Guide 1.54 (June 1973), "Quality Assurance Requirements for Protective Coating Applied to Water-Cooled Nuclear Power Plants," and ANSI Standard N101.4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities." The following requirements are applicable to the coating applied to the interior surfaces of the drywell and torus:

- The quality assurance requirements of Section 3 of ANSI N101.4, applicable to the coating manufacturer, are imposed on the coating manufacturer through the procurement process.
- Coating application procedures are developed based on the manufacturer's recommendations for application of the selected coating systems.
- Coating applicators are required to demonstrate their ability to satisfactorily apply the coatings in accordance with the manufacture's recommendations.
- Quality Control personnel perform inspections to verify conformance to the coating application procedures. Section 6 of ANSI N101.4 is used as a guideline in the establishment of the inspection program.
- Fermi 2 conformance with Regulatory Guide 1.58, Revision 1 regarding qualification of Quality Control Inspection personnel is documented in UFSAR Appendix A.
- Documentation demonstrating conformance to the above is maintained.

The condition of the coating is examined on an on-going basis. Selected areas of the drywell are inspected every 18 months during each refueling outage. The entire containment, including both the drywell and torus, receives a visual inspection every 3-1/3 years per the 10CFR50, Appendix J Program. These periodic inspections will identify evidence of flaking, blistering, peeling, discoloration, or other signs of coating distress that might be indicative of degradation of the containment structural integrity.

Detroit Edison's letter number NRC-98-0145, dated November 11, 1998, provided the NRC with the information requested by Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System after a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment."

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Nebraska Public Power District
Nebraska's Energy Leader

NLS990110

November 8, 1999

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Gentlemen:

Subject: CNS Strategy for Achieving Engineering Excellence, Revision 3

- References:
- 1) Letter from Thomas P. Gwynn (U.S. Nuclear Regulatory Commission) to G. R. Horn (Nebraska Public Power District), dated October 30, 1998, "Plans for Monitoring Progress of the Cooper Nuclear Station Strategy for Achieving Engineering Excellence"
 - 2) Letter NLS990053 from John H. Swailes (Nebraska Public Power District) to Document Control Desk (U.S. Nuclear Regulatory Commission), dated May 19, 1999, "CNS Strategy for Achieving Engineering Excellence, Revision 3"

By letter dated October 30, 1998 (Reference 1), the Nuclear Regulatory Commission (NRC) requested that Nebraska Public Power District (District) inform the NRC, in writing, of significant changes to the CNS Strategy for Achieving Engineering Excellence (Strategy). Specifically, the District was asked to inform the NRC of all schedule changes of greater than one month. By letter dated May 19, 1999 (Reference 2), the District submitted Revision 3 of the Strategy to the NRC. Three commitments made in Revision 3 of the Strategy were not completed by the estimated completion dates provided in Reference 2. Each of these items was not completed by the committed date as a result of not allowing adequate time to complete the necessary review and approval of the closure documentation. Those items with schedule changes are:

- 1) Revision 3 Item 3.1.3 - Implement "configuration change" process improvements, Phase 2, to align to new Engineering vision. The estimated completion date was 6/30/99. The actual completion date was 8/17/99.
- 2) Revision 3 Item 3.3.1.2 - An EOP/design basis review will be conducted as per Action 3.3.e of the Strategy. The estimated completion date was 6/30/99. The actual completion date was 9/11/99.

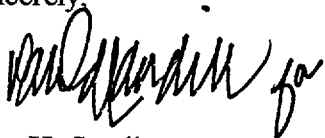
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- 3) Revision 3 Item 3.3.1.5 - Complete Phase 2 of backlog reduction project. The estimated completion date was 7/1/99. The actual completion date was 7/27/99. Although this item was not extended for greater than one month, the District is notifying the NRC of this extension in accordance with our commitment management program.

Should you have any questions concerning these schedule changes, please contact Bruce Rash, Senior Engineering Manager, at (402) 825-2943.

Sincerely,



John H. Swailes
Vice President of Nuclear Energy

/lb

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

ATTACHMENT 3 LIST OF NRC COMMITMENTS

Correspondence No: NLS990110

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	