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April 29, 1993  
NRC-93-0060

Chief, Rules Review and Directives Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) Proposed Generic Communication; "Line Item Technical Specification Improvements to Reduce Testing During Power Operation," 58 FR 16881
  - 3) Detroit Edison letter to NRC, "Proposed Technical Specification Change (License Amendment) - Suppression Chamber-to-Drywell Vacuum Breakers," NRC-93-0032, dated March 23, 1993

Subject: Detroit Edison Comments on Proposed Generic Letter to Reduce Testing During Power Operation (58 FR 16881)

Detroit Edison appreciates the opportunity to comment on the proposed Generic Letter to reduce testing during Power Operation (Reference 2). We support the concept that unnecessary surveillance testing is a significant regulatory burden which should be eliminated.

We have a general concern that the generic letter, when issued, should reflect that the recommendations and guidance provided are based upon information available to the NRC at a single point of time. The Generic Letter must not be construed to preclude additional changes in the areas addressed in the generic letter as further information becomes available.

Our concern is specifically illustrated by Reference 3, which proposes to replace the monthly suppression chamber-to-drywell vacuum breakers functional testing during power operation with testing during shutdown conditions. Section 8.4 of the proposed Generic Letter recommends that the monthly testing during power operation should be retained. However, the example is limited to the BWR/5 Standard Technical Specifications.

This section of the Generic Letter could prejudice the review of Reference 3 even though the Reference 3 proposal is based upon unique problems associated with Mark I BWR containments.

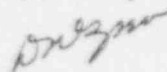
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We request that Section 8.4 of the proposed generic letter be modified to indicate that the monthly testing frequency in Mark I BWR containments is under review. We also ask that general wording be added to the generic letter to indicate that further changes will be considered to the areas allowed in the generic letter as additional information becomes available.

If you have any questions about our comments, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,



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