

Detroit
Edison

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August 29, 1994
NRC-94-0068

U. S. Nuclear Regulatory Commission
Attn: 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, NRC-87-0243
"Response to Notice of Violation
50-341/87028", Dated November 13, 1987
- 3) NRC Letter Dated December 16, 1987
- 4) Detroit Edison Letter, NRC-87-0256
"Response to NRC Restart Letter
Item 2", Dated November 30, 1987
- 5) Detroit Edison Letter NRC-87-0268
"Response to Notice of Violation 50-341/87028,
Revision 1", Dated December 30, 1987
- 6) NRC Generic Letter 88-14, "Instrument Air Supply
System Problems Affecting Safety-Related
Equipment", Dated August 8, 1988
- 7) Detroit Edison Letter, NRC-89-0046,
"Response to NRC Generic Letter 88-14",
Dated March 1, 1989
- 8) NRC Inspection Report No. 50-341/91009,
Dated July 10, 1991

Subject: Revisions to NRC Commitments

References 5 and 7 provided Detroit Edison's response to two NRC items. Detroit Edison is modifying some commitments in these letters due to additional operating experience and program changes. It is desirable to revise these commitments to reduce regulatory burden.

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1. NRC issued Notice of Violation 87028-01 for failure to perform Preventative Maintenance (PM) items. Reference 3 requested additional information on the PM Program. Item 3 of Reference 3, requested, "what actions you [Detroit Edison] have taken in the area of justification for postponed PM activities, in that the evaluation documented on the 'Incomplete PM Form' will be based on defined engineering criteria; recognizing that the evaluation should include the effect on the operability and reliability of the component and associated systems."

The response to this request for additional information, reference 5, stated "the PM Evaluation Form requires the evaluator to document what the plant reliability and operability impacts would be and what the safety significance is if the PM activity was not performed. The form requires the approval of an SRO (currently licensed at Fermi 2). Additionally, the Superintendent, Maintenance and Modification and an engineer concur with the justification to reschedule any Priority A PMs. This review process was selected in lieu of predefined criteria because the variety and scope of PM activities precluded development of predefined criteria. As discussed previously, should rescheduling not be justifiable, a Deviation Event Report (DER) is initiated."

Detroit Edison will be revising the PM Evaluation form to delete the required approval of an SRO and the Superintendent of Maintenance and Modification. The form will require the signature of the Initiator, the approvals of the Preventative Maintenance Coordinator and the System Engineer. This new commitment better defines the specific engineer required for the review.

The review by the Preventative Maintenance Coordinator provides a useful review from a PM history perspective. The review performed by the System Engineer provides the best comprehensive review on component and overall system performance with respect to operability and reliability. The approval by the System Engineer will help Fermi 2 move toward implementation of Maintenance Rule, which relies on System Engineering input for many aspects of that program. System Engineering review and approval will only be required for safety related equipment or those systems/components that fall within the Maintenance Rule Program scope.

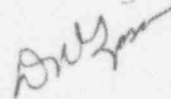
The required approvals on the PM Evaluation form will be controlled in accordance with the administrative controls established in the Fermi 2 PM Program procedure. Accordingly, the specific required approval is no longer considered to be a regulatory commitment.

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The first commitment deals with the Fermi 2 Preventative Maintenance (PM) Program and the required sign-offs for deferrals. The second commitment deals with the Non-Interruptible Instrument Air System and periodicity of required dew point checks. Details on the changes are included in the enclosure to this letter.

Please contact Elizabeth A. Hare, Senior Compliance Engineer, at (313) 586-1427 if you have any questions.

Sincerely,



Enclosure

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer
Region III

2. In response (reference 7) to NRC Generic Letter (GL) 88-14, Detroit Edison committed to change the periodicity of the quarterly dew point check of the Non-Interruptible Instrument Air System (NIAS) to monthly. This was done in lieu of adding a continuous dew point monitor. At the time of changing from quarterly to monthly dew point checks, little performance data had been gathered to evaluate the effectiveness of the Preventative Maintenance on this system. During the last five years, approximately 125 dew point checks have been performed on NIAS. Of these PM checks only three have required the desiccant to be changed out.

Based on the successful dew point checks on both Division I and II, the PM events are being revised to a quarterly periodicity. Future test results will continue to be reviewed and the periodicity may be changed again in the future in accordance with the administrative controls established in the Fermi 2 PM Program procedure. Accordingly, the specific frequency of the periodic tests is no longer considered to be a regulatory commitment. The quarterly interval will be sufficient to monitor any degradation in the performance of the NIAS desiccant at this time.