

Detroit
Edison

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November 22, 1994
NRC-94-0124

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) NRC Letter to Detroit Edison, "Confirmatory Action Letter," dated December 28, 1993
 - 3) Detroit Edison Letter to NRC, "Response to Confirmatory Action Letter on December 25, 1993 Turbine Event," NRC-94-0075, dated August 24, 1994
 - 4) Detroit Edison Letter to NRC, "Supplementary Response to Confirmatory Action Letter on December 25, 1993 Turbine Event," NRC-94-0093, dated October 13, 1994
 - 5) NRC Letter to Detroit Edison, "Fermi 2 - Restart Action Plan Issues Closeout - Safety Evaluation," dated November 15, 1994

Subject: Detroit Edison Comments on the NRC Safety Evaluation of
Fermi 2 Restart Action Plan Issues Closeout

In Reference 3 Detroit Edison submitted its response to the NRC Confirmatory Action Letter (CAL) on the December 25, 1993 turbine event (Reference 2). This response was supplemented by Reference 4. The purpose of this letter is to provide Detroit Edison's comments on the NRC's Safety Evaluation of Fermi 2 Restart Action Plan issues closeout provided by Reference 5.

Detroit Edison has completed a review of Reference 5 which forwarded the NRC's Safety Evaluation of several Restart Action Plan Issues. Comments resulting from that review are included in the enclosure to this letter.

In addition to these comments, we have noted that in several instances statements were made in the text of the Safety Evaluation that included the phrase "The licensee committed...". With the exception of the specific comments in the Enclosure, Detroit Edison is not aware

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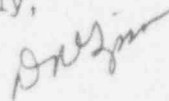
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of any of these statements being different than planned actions. In the interest of clarification, however, it should be noted that the only "commitments" that were intended to be formally tracked using the Fermi 2 Regulatory Commitment management program are those items specifically identified as commitments in the cover letters for Reference 3 and 4.

In Attachment 2 of Reference 3, Detroit Edison incorrectly used the term "hydrolyzing" to describe the method for cleaning the reactor vessel internals. The common terminology/spelling is "hydrolazing". There were no chemicals used; water was the fluid used for the cleaning.

If you have any questions, please contact Lynne S. Goodman at (313) 586-4097.

Sincerely,



Enclosure

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
A. Vogel

SER COMMENTS AND ISSUES

| <u>SER Pg.</u> | <u>Item</u> | <u>Reference</u> |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| 3 | Detroit Edison committed to review the extraction steam and feedwater heater drain systems and implement any appropriate changes prior to restart from RF-05. This commitment was clarified in NRC-94-0093 to refer to specific portions of the systems. The SER wording, however, implies that this review has been completed. | NRC-94-0075 Pg. 2, also Encl. 1, Pg. 9 NRC-94-0093 Pg. 5, 6 |
| 3 | Detroit Edison committed to "...moisture carryover/removal testing..." following RF-04. The commitment did not specify moisture separator reheaters and extraction steam systems, and was intended to apply to the moisture separator reheaters. | NRC-94-0075 Pg. 2, also Encl. 1, Pg. 9 |
| 3 | Detroit Edison did not commit to measure and record electrical system disturbances during startup and full load to monitor torsional vibration. This was a recommendation by a Root Cause Analysis Team in their report. However, as noted in the referenced item, the recommendations related to torsional resonance analyses and testing on the existing machine have been dispositioned through analyses. | NRC-94-0075 Encl. 1, Pg. 10, Item 6 |
| 5 | Detroit Edison mentioned that vibration of 10 mils during initial startup would not be unusual. Vibration of this magnitude is possible, but not anticipated. | NRC-94-0093 Encl. 2, Pg. 1 |
| 9 | Four bundles of irradiated fuel were inspected on site and some hardware from 4 bundles and scrapings from 3 bundles were sent to G.E.'s laboratory, rather than 6 bundles being inspected at the laboratory. There were 6 bundles involved collectively. | NRC-94-0075 Encl. 2, Pg. 1, 2 NRC-94-0093 Encl. 1, Pg. 4 |

| <u>SER Pg.</u> | <u>Item</u> | <u>Reference</u> |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| 16 | There was a potential concern expressed by the AIT on whether check valves could prevent fluid draining to ECCS rooms from Radwaste. The SER implies that this was a concern "during the event". | Inspection Report 94-005 |
| 14 | Radwaste Building separated from Turbine Building by seismic gap is not correct. Also, the Radwaste Building was not designed as barrier for turbine missiles. This applies to Reactor/Auxiliary Building. | Final Report Structural Walkdown Pg. 4, 5 |
| 5 | Detroit Edison will balance the entire T-G set during startup only if needed. | NRC-94-0093 Encl. 2, Pg. 2 |
| Cover Ltr. 12 | December 25, 1993 is date of event. | NRC-94-0075 (Cover Letter) |
| 11 | Detroit Edison planned to use but did not use ultrafiltration and reverse osmosis to remove oil. These plans were discussed with NRC representatives and mentioned in the Fermi 2 Chemistry Startup Plan. Instead, cellulose fiber in the condensate filter demineralizer system was used successfully as well as the other listed methods. | Fermi 2 Chemistry Startup Plan Pg. 8, 9 |
| 12 | NPP-CH1-01 together with the Chemistry Startup Plan are being used for water chemistry control during plant startup. These documents together were developed in accordance with EPRI guidelines. | Fermi 2 Chemistry Startup Plan |
| 1 | Treated circulating water from Lake Erie rather than general service water was released from the condenser tubes to the condenser hotwell. | LER 93-014-01 |
| 2, 6 | To be more precise, the failure initiated in blade 9 of the stage 8 blades vs. stage 8 disk. As the SER discusses, there are 6 disks and 8 stages of blades. Also, on p. 6, in Finding 6, more appropriate wording would be the disks for stages 1 through 6 blading and disks for stage 7 and 8 blading vs. stages 1 through 6 disks and stage 7 and 8 disks. | |