

Detroit
Edison

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Nuclear
Operations

12

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FILES REVIEWED DIR. BR.
USNRC

April 26, 1995

NRC-95-0047

11008
60FR15799
03/27/95
T. Scarbrough
A. Kugler

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 Letter; Pressure Locking and Thermal Binding
of Safety-Related Power-Operated Gate Valves, 60 FR 15799,
dated March 27, 1995

Subject: Detroit Edison Comments on Proposed Generic Letter on Pressure
Locking and Thermal Binding of Safety-Related Power-Operated
Gate Valves

The purpose of this letter is to submit Detroit Edison's comments on the subject
proposed Generic Letter (Reference 2):

- For Requested Actions it is recommended to change the required date for these actions from 60 days to 90 days after the date of the generic letter.
- For Required Responses it is recommended to change the required date for a written response from 30 days to 60 days after the date of the generic letter.
- For Attachment 2, item 1: the proposed Generic Letter does not provide adequate justification for the position being taken with regard to small valves.
- Attachment 1 in general appears to be biased against analytical methods or testing to demonstrate acceptability. Little or no justification for this position is provided.

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- Nuclear Plants have operated successfully for many years. As a result, there have been numerous cases of normal shutdown and reactor SCRAMS. The experience gained during these modes of plant operation is a valuable resource, because it can place valves into operating events that are the same as those postulated for pressure locking and thermal binding. The draft generic letter has arbitrarily excluded the use of operating experience as a basis for engineering judgment. The draft generic letter should be revised to permit some use of plant operating experience as a basis for engineering judgment.

If you have any questions, please contact Margaret M. Offerle at (313) 586-1661.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

Enclosure

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