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May 23, 1984
EF2-68,289

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Youngblood:

Reference: (1) Fermi-2
NRC Docket No. 50-341

Subject: Request to Modify SER Statement Concerning Collet
Retainer Tube

Section 4.5.1 of the Fermi-2 SER discusses the design and inspection requirements for the collet retainer tube in the CRD system. This section states in part "the augmented testing program recommended by the General Electric Company will be carried out." The section also indicates that NRC staff would include the "augmented testing program" as a requirement in Fermi's technical specifications. We believe that the phrase "augmented testing program" refers to Edison's response to question 212.155 (Appendix E.5 of the FSAR) in which Edison described a program consisting of three parts. One of the parts was characterized as "an augmented surveillance and inspection program" which consists of the following actions:

1. Each rod not fully inserted will be tested by inserting one or more notches at least weekly to confirm operability.
2. All CRDs removed for maintenance will have a dye penetrant examination made of the outer surface of the collet retainer tube (CRT). The criteria established by General Electric in Service Information Letter (SIL) 139 will be used to decide rejection. The term CRT refers to a portion of the outer tube, and replacement of a rejected CRT requires a new cylinder, tube, and flange subassembly.

Surveillance 4.1.3.1.5 in the Fermi-2 technical specifications currently includes the requirement to perform the dye penetrant exam.

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Mr. B. J. Youngblood

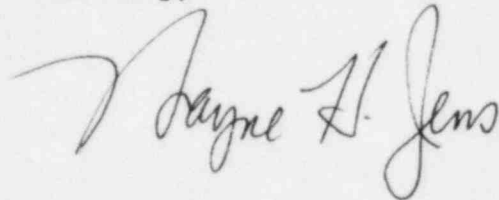
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Since the other two parts of Fermi-2's response to the CRT issue eliminate unnecessary thermal cycling and provide a source of water with very low oxygen content to the CRD system we have determined that the probability of cracking has been made extremely remote. In view of this and the fact that the dye penetrant examination is not included in the GE Standard Technical Specifications nor any other BWR's technical specifications, we request the staff to revise the SER to eliminate this as a technical specification requirement. It will continue to be a commitment, however, and is included in the Fermi-2 maintenance procedures.

Please coordinate the review of this request with Mr. Don Hoffman of your staff to support the Proof and Review process. Should you have any questions, please contact Mr. Keener Earle (313) 586-4211.

Sincerely,

A handwritten signature in dark ink, appearing to read "Wayne H. Jones". The signature is fluid and cursive, with the first name "Wayne" being the most prominent part.

cc: Mr. P. Byron
Mr. M. D. Lynch
Mr. D. Hoffman