

**Detroit
Edison**

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June 25, 1984
EF2-62810

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
- (2) NUREG-0798, Fermi 2 Safety Evaluation
Report, Supplement 3, dated January 1983
- (3) NRC IE Bulletin 79-26 "Boron Loss from
BWR Control Blades", Revision 1, dated
August 29, 1980
- (4) NRC Inspection Report 83-09, May 23, 1983

Subject: License Condition for Control Blade Stress
Corrosion Cracking

Reference 2 identified a license condition which would require surveillance of control blades to identify and quantify stress corrosion cracking and boron depletion. Detroit Edison requests that the proposed license condition not be included, since Edison has established a program to inspect and replace control blades, when necessary. This program has been reviewed and deemed acceptable by the NRC in accordance with the closure of IE Bulletin 79-26 as noted in Reference 4 (Attachment 1).

IE Bulletin 79-26 identified a concern addressing a failure mode for control blades, identified by GE, which resulted in a loss of boron-10. The boron would leach out through cracks at tube locations with more than 50 percent local boron-10 depletion. Operating plants were requested to both analytically determine the boron depletion in the upper quarter of

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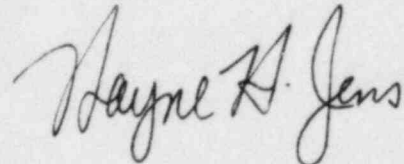
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every control blade, and perform a destructive examination of the most highly exposed control blade and document the location of cracks in the blade. Fermi 2 responded to this bulletin by developing Reactor Engineering Procedure 57.000.09, Core Component Management Guidelines, which requires the replacement of control blades when a 10 percent reduction of rod worth occurs (i.e., a 34 percent average boron-10 depletion in the top quarter segment). This position was reviewed and accepted by the NRC via Reference 4.

Detroit Edison believes that the requirements of IE Bulletin 79-26, Revision 1, are satisfied by the procedure cited above, and requests that the condition set forth in SER Supplement 2 not be included in the license on this basis.

If you have any questions concerning this submittal, please contact Mr. O. Keener Earle at (313) 586-4207.

Sincerely,

A handwritten signature in dark ink, appearing to read "Wayne H. Jens". The signature is fluid and cursive, with the first name "Wayne" being more prominent and the last name "Jens" following in a similar style.

cc: Mr. P. M. Byron
Mr. M. D. Lynch
USNRC, Document Control Desk
Washington, D. C. 20555

Excerpt from NRC Inspection Report 83-09

I&E Bulletin No. 79-24 (CLOSED) "Frozen Lines:" Review of DECo internal memo dated October 16, 1981 states that this bulletin not applicable to Fermi. The subject of freezing environmental effects was transmitted on their docket by NRC Question 212.27 which was satisfactory.

This bulletin is considered closed.

I&E Bulletin No. 79-26 and Revision 1 (CLOSED) "Boron Loss From BWR Control Blades:" Review of DECo letter dated January 9, 1981 (EF2-51,583) subject as above stating that the licensee plans to discharge blades when they have reached 34% boron-10 depletion in the upper quarter. It also planned to track boron depletion by computer calculation, which should prove adequate.

This bulletin is considered closed.

I&E Bulletin No. 79-27 (OPEN) "Loss of Non-Class-1-E Instrumentation and Control Power System BUS During Operation:" Review of DECo letter dated August 31, 1981 (EF2-54,384) to licensing project manager U.S. NRC. This bulletin remains open pending review by the Licensing Project Manager and his response to the licensee.

I&E Bulletin No. 79-28 (CLOSED) "Possible Malfunction of NAMCO Model EA180 Limit Switches at Elevated Temperatures:" Review of DECo letter subject as above dated January 25, 1980 (EF2-47,811) stating that design engineering has determined that the referenced Model NAMCO switch has not been specified, purchased or installed on any present designs. Existing valve monitoring circuits employ NAMCO Model EA-740 limit switch which is cam operated compared to the latch operated EA-180. Current and potential valve suppliers have by design based their valve position indication on the use of cam operated switches.

This bulletin is considered closed.

I&E Bulletin 80-03, (CLOSED) "Loss of Charcoal from Standard Type II, 2 Inch, Tray Adsorber Cells:" A visual inspection was performed by the licensee to determine rivet spacing and screen casing separation, which could lead to loss of charcoal from the charcoal adsorbers. The licensee has determined that charcoal adsorbers are used for three applications on site. Control center HVAC Emergency Makeup and Recirculating Air Filter Unit, and Standby Gas Treatment System Air Filter Units were inspected for rivet spacing and screen/casing separation and determined by the licensee to be adequate. The reactor pressure vessel head purging unit has not been designed and the licensee has committed to review design prior to construction of unit.

This bulletin is considered closed.

I&E Bulletin No. 80-06 (CLOSED) "Engineered Safety Feature (ESF) Reset Controls:" Review of the licensee's records, indicates that a reset of an ESF actuation signal at Fermi 2, for those systems described in the