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**Detroit
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July 20, 1984
EF2-69204

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) Detroit Edison letter to NRC, "License Condition for Control Blade Stress Corrosion Cracking", EF2-62810, June 25, 1984
(3) Detroit Edison letter to NRC, "Request to Modify SER Statement Concerning Collet Retainer Tube", EF2-68289, May 23, 1984
(4) Detroit Edison letter to NRC, "Changes in Provisions for Plant Fire Protection", EF2-61562, March 1, 1983
(5) Detroit Edison letter to NRC, "Fermi 2 Safety Evaluation Report Corrections", EF2-56767, August 2, 1982

Subject: Detroit Edison Comments on NUREG-0798

Detroit Edison recently completed a detailed review of NUREG-0798, "Safety Evaluation Report Related to the Operation of Enrico Fermi Atomic Power Plant, Unit No. 2" and its three supplements. The review was conducted to identify differences in fact between NUREG-0798 and those presented in the Fermi 2 Final Safety Analysis Report, Technical Specifications, correspondence and current design. Attachment 1 documents both these differences and Detroit Edison's comments on each.

This review was prompted by the following two actions:

1. NRC is currently scheduled to issue the Proof and Review version of Fermi 2 Technical Specifications on July 20. Since the NRC bases its review of the Technical Specification on the SER (and its supplements), it was necessary to identify those areas of the SER

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that did not accurately reflect the Fermi 2 plant. Therefore, these comments should be provided to NRC staff personnel presently involved in the review of Fermi's Technical Specifications.

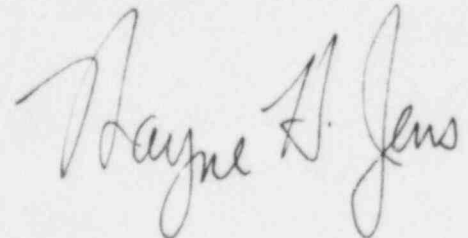
2. Current NRC practice for NTOLs is to require an officer of the utility to state that the SER, FSAR and Technical Specifications are both consistent and accurate in reflecting the plant's design. To support this requirement, the subject review was performed.

The comments provided in Attachment 1 complement those provided to your staff on the SER and its supplements via References 2 through 5.

A similar review will be performed for all additional supplements issued to NUREG-0798.

If you have any questions, please contact Mr. Keener Earle at (313) 586-4211.

Sincerely,



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

*With attachment

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*With Attachments

Detroit Edison Comments

In the sixth line of the 1st paragraph, remove the phrase "except the switchyard". The switchyard contains no safety grade equipment. This was identified previously in EF2-56,767 dated August 2, 1982.

Current SER Discussion

The figure depicts control rod drive flow originating from the condensate storage tank.

Detroit Edison Comments

Normal supply for control rod drive system is from the condensate polishing demineralizer system. This was identified previously in EF2-56,767 dated August 2, 1982.

Current SER Discussion

"High energy piping systems considered were main steam, feedwater, steam supply to high pressure coolant injection pump turbine, steam supply to reactor core isolation cooling pump turbine, reactor water cleanup and control rod drive....Moderate energy systems considered were residual heat removal, core spray, high pressure coolant injection, fire protection, reactor core isolation cooling, fuel pool cleanup, reactor building closed cooling water system, service water, emergency equipment cooling water and reactor water cleanup system."

Detroit Edison Comments

The reference to the control rod drive system in list of high energy piping systems should be revised to include only the insert and withdrawal lines and charging line of the control rod drive system. The balance of the control rod drive system should be identified as moderate energy piping. This is consistent with FSAR Section C.3.3.1 and C.3.3.2 (per Amendment 12 - June, 1978).

Current SER Discussion

"Piping systems considered included main steam, reactor recirculation, feedwater, high pressure coolant injection, reactor core isolation cooling, core spray, reactor water cleanup, control rod drive return lines, reactor head spray and steam to the reactor core isolation cooling pump turbine."

Detroit Edison Comments

The control rod drive return lines have been deleted from the Fermi 2 design. FSAR Section 3.6.1.4 has been modified via Amendment 57 (May, 1984) to reflect this revision.

Current SER Discussion

"Adverse environmental conditions were found and analyzed for the following breaks: main steam line in the steam tunnel, feedwater line in the steam tunnel, steam supply to the high pressure coolant injection system in the pump room, steam supply to the reactor core isolation cooling system in the torus room and the reactor water cleanup system in the containment penetration room. Design provisions incorporated for protection from environmental effects include:a vent opening between the transformer and the turbine building....".

Detroit Edison Comments

The SER discussion above should be expanded to include the analysis performed of environmental impact for a break in the steam supply line to the reactor core isolation cooling (RCIC) system in the RCIC pump room. FSAR Section C.4.4.2.2.1 has been revised via Amendment 57 (May, 1984) to provide a discussion of this analysis.

In addition, the vent opening discussed in the SER is present between the pipe tunnel and the first floor of the auxiliary building (not the transformer and turbine building). This information is also reflected in Amendment 57 to FSAR Section C.4.4.2.2.1.

Current SER Discussion

SER: "In the dynamic response spectrum method of analysis of balance-of-plant piping and components, the square root of the sum of the squares of the maximum co-directional responses is used in accounting for three spatial components of the earthquake motion.

Under the NSSS scope of supply, the two horizontal components and one vertical component of ground motion were accounted for in the following manner: Two sets of seismic results were obtained."

SSER 3- "The dynamic response of the NSSS piping was calculated by using the enveloped response spectrum method of analysis."

Detroit Edison Comments

The SER currently indicates that seismically designed NSSS piping is analyzed differently than seismically designed BOP piping. As indicated in FSAR Section 3.7.3.6.2 (per Amendment 57 - June, 1984), all seismically designed piping (i.e., both NSSS and BOP piping) is analyzed in accordance with Regulatory Guide 1.92.

With respect to the SSER 3 reference, SSER1, Section 3.7.3 indicated that reanalysis of NSSS piping to reflect as-built conditions would use either the envelope method or multiple support excitation method to address response spectra for support and anchor locations. As indicated in Appendix G of EF2-57885, dated May 18, 1982 (attached), Edison used the multiple support excitation method.