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October 13, 1995
NRC-95-0106

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 Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-related Power Operated Gate Valves," dated August 17, 1995
- 3) Detroit Edison letter to NRC, "Detroit Edison Initiatives on Pressure Locking and Thermal Binding of Gate Valves at Fermi 2," NRC-93-0127, dated October 13, 1993
- 4) Detroit Edison letter to NRC, "Status of Detroit Edison Initiatives on Pressure Locking and Thermal Binding of Gate Valves," NRC-94-0102, dated November 2, 1994

Subject: Detroit Edison Response to NRC Generic Letter 95-07

This letter provides Detroit Edison's response to Generic Letter (GL) 95-07, which required a written response within 60 days from the date of the generic letter. This Generic Letter requests that licensees perform, or confirm that they previously performed, evaluations of operational configurations of safety-related, power-operated (including motor-, air-, and hydraulically operated) gate valves for susceptibility to pressure locking and thermal binding. The GL also requests that further analyses be performed and any needed corrective actions be implemented to ensure that safety-related power-operated gate valves that are susceptible to pressure

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locking or thermal binding are capable of performing the safety functions within the current licensing bases of the facility.

Detroit Edison has previously addressed the Pressure Locking and Thermal Binding (PL & TB) issue applying, as appropriate, the guidance of GL 89-10 Supplement 6 and INPO SOER 84-7. The consideration of these issues was discussed in References 3 and 4 and resulted in the modification of 3 valves during the 4th refueling outage. Two additional valves are currently scheduled to be modified as a result of PL & TB considerations during the forthcoming 5th refueling outage, currently scheduled for September 1996. An operability determination for these two valves has been completed and is documented in an Engineering Functional Analysis (EFA).

The actions requested by GL 95-07, therefore, are anticipated to be a confirmatory review for motor operated valves (MOVs) previously evaluated and modified as described above. Additional reviews for all other power operated valves will be performed using the guidance provided by Attachment 1 to GL 95-07.

Detroit Edison's responses to the specific requirements of GL 95-07 are provided in the enclosure to this letter. In view of the actions already taken, an alternate schedule for completing all of the actions requested by GL 95-07 is being proposed.

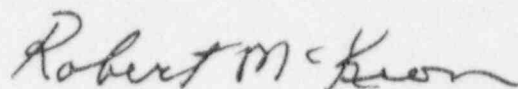
This letter includes the following new commitments which replace all previous commitments included in References 3 and 4:

1. A screening evaluation as described in the Enclosure to this letter will be performed within 180 days from the date of GL 95-07 to identify valves potentially susceptible to PL & TB.
2. Evaluations and analyses will be performed as described in the Enclosure to this letter within one year from the date of GL 95-07.
3. A response including the information requested by GL 95-07 will be provided within one month following completion of the evaluations and analyses referred to in item 2 above; i.e., no later than one year and one month from the date of GL 95-07.

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If you have any questions, please contact Mr. Robert A. Newkirk at (313) 586-4211.

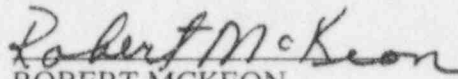
Sincerely,

A handwritten signature in cursive script, appearing to read "Robert M. Newkirk". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

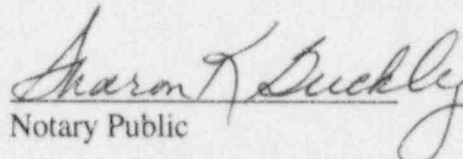
cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel

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I, ROBERT MCKEON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


ROBERT MCKEON
Assistant Vice President and
Manager Operations

On this 13th day of October, 1995 before me personally appeared Robert McKeon, being first duly sworn and says that he executed the foregoing as his free act and deed.


Notary Public

SHARON K. BUCKLEY
NOTARY PUBLIC - MONROE COUNTY, MICH.
MY COMMISSION EXPIRES 06-11-96

DETROIT EDISON RESPONSE TO NRC GENERIC LETTER 95-07

**Pressure Locking And Thermal Binding Of Safety-Related
Power-Operated Gate Valves**

Detroit Edison's detailed response to each item of the "Requested Actions," "Requested Information," and "Required Response" sections of the Generic Letter are provided below.

• **Generic Letter 95-07 Requested Actions**

Requested 90 day action:

"Within 90 days of the date of this generic letter, each addressee of this generic letter is requested to perform and complete the following actions:

- 1. Perform a screening evaluation of the operational configurations of all safety-related power-operated (i.e., motor-operated, air-operated, and hydraulically operated) gate valves to identify those valves that are potentially susceptible to pressure locking or thermal binding; and*
- 2. Document a basis for the operability of the potentially susceptible valves or, where operability cannot be supported, take action in accordance with individual plant Technical Specifications."*

Detroit Edison Response:

1. A screening evaluation will be performed as requested by item 1 above to identify those valves that are potentially susceptible to pressure locking or thermal binding.
2. For the valves identified as potentially susceptible to PL or TB by the screening evaluation, the basis for operability will be appropriately documented. Where operability cannot be supported, action in accordance with the Fermi 2 Technical Specifications will be performed.

Detroit Edison will complete the actions described above within 180 days from the date of the generic letter. As stated in the cover letter, this alternate schedule is being

proposed in view of the actions already taken by Detroit Edison with regard to the PL & TB issue.

Requested 180 day action:

"Within 180 days of the date of this generic letter, each addressee of this generic letter is requested to implement and complete the guidance provided in Attachment 1 to perform the following actions:

- 1. Evaluate the operational configurations of safety-related power-operated (i.e., motor-operated, air-operated, and hydraulically operated) gate valves in its plant to identify valves that are susceptible to pressure locking or thermal binding;*
- 2. Perform further analyses as appropriate, and take needed corrective actions (or justify longer schedules), to ensure that the susceptible valves identified in 1 are capable of performing their intended safety function(s) under all modes of plant operation, including test configuration."*

Detroit Edison Response:

Detroit Edison will complete the evaluations and analyses described above within one year from the date of the generic letter. As stated in the cover letter, this alternate schedule is being proposed in view of the actions already taken by Detroit Edison with regard to the PL & TB issue. A schedule for any corrective actions determined to be needed will be provided with the information requested by GL 95-07.

Detroit Edison has not yet determined how surveillance testing configurations will be considered in these evaluations. Attachment 1 to GL 95-07 indicates that these configurations need to be addressed. It is anticipated that this will be the subject of further discussion at the forthcoming workshop on this Generic Letter. At this time, however, Detroit Edison's commitment is limited to addressing the test configuration issue considering, as appropriate, factors such as the duration of testing, applicability of Technical Specification action statements during such testing, and the current licensing bases of Fermi 2.

• **Generic Letter 95-07 Requested Information**

"All addressees, including those who have already satisfactorily addressed pressure locking and thermal binding for MOVs by implementing the guidance in Supplement 6 to GL 89-10 (or equivalent industry methods), are requested to provide a summary description of the following:

- 1. The susceptibility evaluation of operational configurations performed in response to (or consistent with) 180-day Requested Action 1, and the further analyses performed in response to (or consistent with) 180-day Requested Action 2, including the bases or criteria for determining that valves are or are not susceptible to pressure locking or thermal binding;*
- 2. The results of the susceptibility evaluation and the further analyses referred to in 1 above, including a listing of the susceptible valves identified;*
- 3. The corrective actions, or other dispositioning, for the valves identified as susceptible to pressure locking or thermal binding, including: (a) equipment or procedural modifications completed and planned (including the completion schedule for such actions); and (b) justification for any determination that particular safety-related power-operated gate valves susceptible to pressure locking or thermal binding are acceptable as is."*

Detroit Edison Response:

The information requested by GL 95-07 will be provided; however, an alternate schedule is proposed as discussed below. Schedules for any corrective action determined to be necessary will be included with this information. These schedules will take into account risk significance and plant operations and outage schedules. Any operability concerns that may arise during the course of the evaluations will be addressed in accordance with Fermi 2 procedures which are consistent with the guidance in Generic Letter 91-18.

• **Generic Letter 95-07 Required Response**

Required 60 day response:

- "1. Within 60 days from the date of this generic letter, a written response indicating whether or not the addressee will implement the action(s) requested above. If the addressee intends to implement the requested action(s), provide a schedule for completing implementation. If an addressee*

chooses not to take the requested action(s), provide a description of any proposed alternative course of action, the schedule for completing the alternative course of action (if applicable), and the safety basis for determining the acceptability of the planned alternative course of action;"

Detroit Edison Response:

This letter provides the required response.

Required 180 day response:

- "2. *Within 180 days from the date of this generic letter, a written response to the information request specified above.*"

Detroit Edison Response:

Detroit Edison will provide the information requested above within one month from the completion of the requested actions; i.e. no later than one year and one month from the date of GL 95-07. As stated in the cover letter, this alternate schedule is being proposed in view of the actions already taken by Detroit Edison with regard to the PL & TB issue.