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July 31, 1984  
EF2-66712

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) Letter, Detroit Edison to NRC, "Schedule for Detroit Edison's Compliance with NUREG-0737, Item II.K.3.18, 'ADS Logic Modification'", EF2-56943, April 26, 1982
  - (3) Letter, T. J. Dente to D. G. Eisenhut, "NUREG-0737 Item II.K.3.18, Modification of Automatic Depressurization System Logic", BWROG-8260, dated October 28, 1982
  - (4) NUREG-0519, Supplement 5, "Safety Evaluation Report Related to the Operation of LaSalle County Stations, Units 1 and 2", Page 22-8, August, 1983
  - (5) NUREG-0991, "Safety Evaluation Report Related to the Operation of Limerick Generating Station, Units 1 and 2", Page 15-25, August, 1983

Subject: Modifications of ADS Logic  
(NUREG-0737, Item II.K.3.18)

The BWR Owners Group submitted, via Reference 3, a report which identified ADS logic modifications intended to address both the NUREG-0737 requirements and the ATWS consideration. Detroit Edison notified the NRC in Reference 2 and a revision to FSAR Appendix H.II, Item H.II.K.3.18 that any commitment to the BWROG-proposed ADS modifications would be provided only after the NRC had both completed its review of Reference 3 and documented its recommendations.

As a result of the NRC approval of Option 4 of Reference 3 on the LaSalle and Limerick dockets (References 4 and 5, respectively), Edison has decided to similarly implement

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July 31, 1984  
Mr. B. J. Youngblood  
EF2-66712  
Page 2

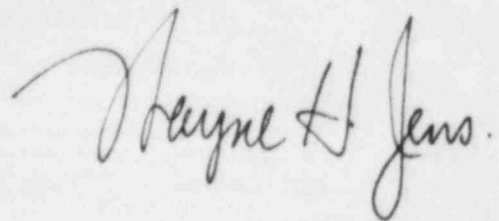
Option 4. Implementation will involve the installation of an ADS manual inhibit switch, in conjunction with a timer which will bypass the high drywell pressure permissive signal after a sustained low water level indication. Edison has initiated the required design work, but due to the long lead delivery times from General Electric and the current advanced status of the preoperational test program, Edison is reiterating its previous commitment (see Reference 2) to complete the required modification by completion of the first refueling outage.

It is obviously highly desirable to keep any modifications to the plant to a minimum during the preoperational and startup testing phase. In addition, alterations to ECCS logic should not be "rushed" until the full impact of such changes can be understood. As you are aware, such changes also involve changes in Emergency Operating Procedures and training. Until such time that the alterations are made, adequate justification for interim operation is provided by the past operating history of BWR's and the fact that, as stated in Reference (3), the current ADS logic design together with the symptom based Emergency Procedures satisfies the intent of NUREG-0737, Item II.K.3.18 in that this combination provides additional assurance of adequate core cooling for LOCA events which do not directly produce a high drywell pressure signal.

Please advise of any additional plant unique information that may be required to support your review of this issue.

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

Sincerely,



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