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September 10, 1984
EF2-69706

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

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

(2) Letter W. H. Jens to J. G. Keppler
April 20, 1984, EF2-67809

Subject: Report of 10CFR50.55(e) Item 135
"Design Deficiency of Conduit Support Weld
Details"

On August 9, 1984, Detroit Edison's Mr. Lewis P. Bregni, telephoned Mr. J. McCormick-Barger of the NRC Region III to report that some conduit support weld details in Standard ED of Specification 3071-128 were modified by Design Change Request (DCR) E-3006 without a seismic review. This discrepancy was discovered during a review of conduit supports relating to 10CFR50.55(e), Item 119, Reference (2).

Description of Deficiency

Welds were deleted from eight conduit support standards in Edison Specification 3071-128-ED (e.g., Standard ED-25-1) by DCR-E-3006 without seismic qualification review. This deficiency was discovered by Giffels Associates, Inc. (GAI) during the review of the structural adequacy of unistrut cross arms done to resolve 50.55(e), Item 119, Reference (2). When the two-sided welds, shown in the current revision (Rev. AH) of specification 3071-128-ED which connect unistrut cross-arms to main tube steel support members were checked, GAI noted that they were not sufficient to withstand design loads by a sufficient factor in the worst case. A subsequent review of the calculations upon which the standards were based revealed that all-around welds (four sided) were originally required at these connections. An evaluation revealed that DCR-E-3006, issued in May of 1980, changed the details to require only two parallel welds.

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Analysis of Safety Implications

The structural integrity of safety related supports built to the deficient standards could not be assured under design seismic event conditions.

Corrective Action

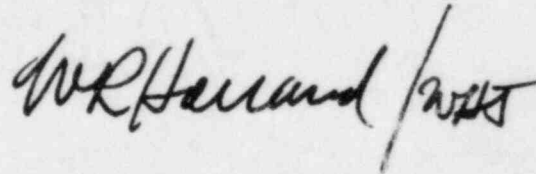
GAI reviewed the structural adequacy of the subject weld details and provided necessary design changes to the standards. DCN-10592, Rev. A, was issued on August 17, 1984, to revise the weld details.

Detroit Edison's Field Engineering Conduit Design Group conducted a survey of all appropriate "as-built" drawings, conduit engineering sketches, and open documents to determine the scope of the deficiency. This survey identified 130 existing conduit supports which do not meet the revised standards. GAI is reviewing these supports on a case-by-case basis and identifying any which require rework.

Because of the recent discovery of conduit support standard deficiencies, GAI has been requested to make a comprehensive review of the three specifications for which they originally provided calculations. These three are: Specification 3071-128-ED (Electrical Engineering Standard-Conduit Supports), Specification 3071-185 (I&C Standards for Tube Supports), and Specification 3071-232 (I&C Standards for Tube Supports-RHR Complex).

Another report of this item, either interim or final, will be sent when further information is available. If you have questions concerning this matter, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

A handwritten signature in dark ink, appearing to read "WR Hammond / WRS". The signature is written in a cursive, somewhat stylized font.

cc: Mr. P. M. Byron
Mr. R. C. DeYoung
Mr. R. C. Knop