

**Detroit
Edison**

Wayne H. Jens
Vice President
Nuclear Operations

Fermi-2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-4150

EF2-72025
December 7, 1984

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 to NRC Letter,
 "Design of Alternative Shutdown
 Approach", EF2-72001, dated
 October 22, 1984

 3) Detroit Edison to NRC Letter,
 "Implementation of Alternative Shutdown
 at Fermi 2", EF2-71994, dated
 October 22, 1984

Subject: Additional Information
 Concerning Fire Protection

On November 2, 1984, representatives from Detroit Edison met with the NRC concerning the design of the alternative shutdown system and the schedule for implementation of that system (References (2) and (3), respectively). Further clarification was provided during the week of November 5th to Mr. W. LeFave, of the Auxiliary Systems Branch, concerning the design as described in Reference (2). It is Edison's understanding, based on these clarifications, that Mr. LeFave's questions have been resolved and that the design of the alternative shutdown system at Fermi 2 is acceptable. This must, of course, be confirmed in a supplement to the Fermi 2 Safety Evaluation Report. The draft FSAR change for the Alternate/Dedicated shutdown design [attached to Reference (2)] only requires minor modifications to account for the clarification given to Mr. LeFave. This FSAR change, including changes to other pertinent FSAR sections based on the final fire protection design at Fermi 2, will be included in a forthcoming FSAR amendment. The FSAR change will also include appropriate information from Edison/NRC correspondence over the past several months based on the NRC requests for information and clarification.

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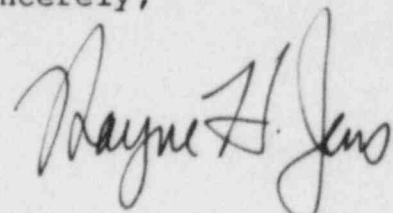
The schedule for implementation of the alternative shutdown concept and the requisite compensatory measures [Reference (3)] were also discussed with the NRC staff and agreed upon at the November 2nd meeting. Detroit Edison's understanding of the agreement is as follows.

- o The operating license for Fermi 2 will be conditioned to require that, by September 30, 1985, all modifications to implement the alternative shutdown design [as documented in Reference (2)] that could be installed without impacting plant operation will be installed. In addition, by September 30, 1985, appropriate procedures will have been approved to provide for adequate implementation of the alternative shutdown design and applicable operators will have been trained on these procedures. Furthermore, by September 30, 1985, Detroit Edison will submit to NRC a request to amend the Technical Specification, as applicable, with appropriate limiting conditions for operation and surveillance requirements to account for implementation of the alternative shutdown design. Detroit Edison will fully implement the alternative shutdown design, as outages permit, in a time frame not to exceed startup after the first refueling or approval of the requested Technical Specification changes, which ever is later. Until such time that the alternative shutdown design is fully implemented, Detroit Edison will retain the appropriate design features and implement the applicable measures described in Reference (3) for the fire areas of concern.

Subsequent to the November 2nd meeting, Edison was informed of the need for some additional information for the NRC staff to complete its review. The questions, informally transmitted, and the Edison responses are included in the attachment.

Please direct any questions to Mr. O. K. Earle at (313) 586-4211.

Sincerely,



cc: (All with attachment)
Mr. P. M. Byron
Mr. M. D. Lynch
Mr. R. L. Ferguson
US NRC Document Control Desk
Washington, DC 20555

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bcc: (All with attachment)

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NRC Chron File

Responses to Informal
NRC Questions

1. What does it require to reset a fire alarm signal received in the control room?

Response: Upon receipt of an alarm in the control room, the operator acknowledges the alarm. This silences the audible annunciation, but leaves the visual. In order for the alarm to be reset, the alarm device must be cleared of whatever is causing the alarm (i.e., if smoke is causing a smoke detector to give an alarm, the smoke must have cleared from the detector). Once this occurs, the alarm is reset at the applicable fire alarm panel(s) in or just outside the relay room and finally reset in the control room.

2. How far above the floor of the steam tunnel are the HPCI/RCIC valves?

Response: The valves are approximately 3 to 4 feet above the floor. It should be noted, however, that safe shutdown is not dependent on the actuation of either of these valves. Depressurization via manual actuation of safety relief valves or ADS, followed by injection by low pressure ECCS systems, performs the same function as HPCI/RCIC and is not dependent on the integrity or functioning of cable or equipment in the steam tunnel. See the FSAR, page 9B.4-37.

3. How many cable trays make up the combustible loading in the SE corner room of the Reactor Building, elev 540' and 562' (Fire Zone 2)?

Response: There are no cable trays on the 540' elevation drawing and three trays on the 562' evaluation drawing. The three trays are each approximately twenty feet long. Two of these trays are along the north end of the diagonal wall at elevations 575' and 573'. The third tray is at the south end of the diagonal wall at elevation 575'. (See FSAR Figure 9B-3 SE corner.) The combustible loading for the three trays is estimated at approximately 18,000,000 BTU. (See FSAR page 9B.4-5.)

Responses to Informal
NRC Questions (Cont'd)

4. What type of suppression system is used in Fire Zone 5 in the Reactor Building?

Response: An automatic sprinkler system is installed in the railroad bay (column A-B, 9-13). See Detroit Edison to NRC letter, EF2-72717, August 3, 1984 (pages 1.16-1.18 in Attachment 1) for appropriate justification for not providing full area suppression. A fire would have to traverse through a water-sprinkled area of the railroad bay to damage unprotected redundant divisional circuits. (See FSAR Figure 9B-4.)