

Detroit
Edison

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March 27, 1996
NRC-96-0036

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Detroit Edison letter to NRC, "Proposed Technical Specification Change (License Amendment) - Implementation of 10 CFR 50 Appendix J Option B," NRC-95-0133, dated December 21, 1995

Subject: Relief Request for Inservice Testing Program for Pumps and Valves to Implement Test Frequencies Consistent with 10 CFR 50 Appendix J Option B

Detroit Edison submitted the Reference 2 proposed License Amendment to implement 10CFR50, Appendix J, Option B. When implemented, this license amendment will allow containment leakage rate test frequencies to be specified by performance-based criteria in the Primary Containment Leakage Rate Testing Program, defined in proposed Technical Specification Section 6.8.5 g. In the case of containment isolation valves, the allowable base test intervals may be increased to a maximum of 60 months. The containment isolation valves are also subject to the testing requirements of the Fermi 2 Inservice Testing Program, which in turn, is based on the requirements of Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition through the Winter 1980 Addenda. Paragraph IWV-3422 of Subsection IWV states in part that valve leak rate tests shall be conducted at least once every 2 years. In the Implementation Plan provided in Enclosure 1 to the Reference 2 submittal, Detroit Edison stated that prior to using extended intervals for certain components in excess of ASME Section XI test interval limits, a relief request will be submitted and approved.

Relief Request VR-61 is attached for review and approval so that Fermi 2 can take full advantage of the performance-based containment leakage test frequencies allowed

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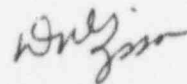
for containment isolation valves by 10 CFR Part 50 Appendix J, Option B. In particular, relief is requested from paragraph IWV-3422 of the applicable code to the extent that it requires leakage testing at least once every 2 years. The basis for the request is that the proposed alternative provides an acceptable level of quality and safety. This acceptable level of quality and safety has been demonstrated by the NRC at the industry-wide level as the basis for revising 10 CFR Part 50 Appendix J to include Option B. The Reference 2 proposed License Amendment reiterates the applicability of this conclusion to Fermi 2 for the purpose of implementing the Option B performance-based requirements. As a result, no additional documentation or justification is provided with the attached relief request to demonstrate that the proposed alternative provides an acceptable level of quality and safety.

It is requested that the enclosed relief request be granted concurrent with, or prior to, the approval of the proposed License Amendment submitted in Reference 2, which requested approval by August 1, 1996. This would allow the new Technical Specifications and the changes to the IST program related to containment leak rate testing to be implemented at the same time prior to the beginning of RFO5, which is scheduled to begin September 27, 1996. Implementation of the new Appendix J Technical Specifications prior to the outage will allow the deferral of Type A testing that would have been required during RFO5 to a future outage.

Several previously granted relief requests extending the test interval from 3 months to refueling stated that the testing during refueling would be performed as part of or concurrent with LLRTs at test intervals no greater than two years. Fermi 2 plans to revise these relief requests to retain the two-year test interval as granted by the relief requests, but using one of the accepted test methods other than the LLRTs as defined in Generic Letter 89-04 or other related regulatory guidance documents. NRC review and approval is not required for these revisions.

No commitments are being made in this letter. If you have any questions on this matter, please contact Mr. Robert Newkirk at (313) 586-4211.

Sincerely,



Enclosure

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

RELIEF REQUEST NO. VR-61

SYSTEM: SYSTEMS PENETRATING PRIMARY CONTAINMENT

COMPONENT: Valves subject to ASME Section XI, Category A Containment Isolation Valve Leakage Tests. See Table VR-61 for a list of valves to which this Relief Request applies.

CATEGORY: A and A/C

FUNCTION: The subject valves perform a containment isolation function as defined in 10CFR50, Appendix A, Criteria 55, 56, and 57.

TEST REQUIREMENTS: Per IWV-3422 the subject valves shall be leak rate tested on a frequency of at least once every 2 years.

BASIS FOR RELIEF: 10 CFR Part 50, Appendix J, has been revised to allow licensees to implement performance-based containment leak rate test intervals in accordance with Regulatory Guide 1.163, dated September 1995. RG 1.163 endorsed, with specific exceptions, NEI 94-01, Industry Guideline for Implementing Performance Based Option of 10CFR50, Appendix J, dated July 26, 1995. Under certain conditions, the base test intervals for containment isolation valve leak rate testing may be as long as 60 months. The basis for the request is that the proposed alternative provides an acceptable level of quality and safety. This acceptable level of quality and safety has been demonstrated by the NRC at the industry-wide level as the basis for revising 10 CFR Part 50 Appendix J to include Option B. The proposed License Amendment that implements Option B reiterates the applicability of this conclusion to Fermi 2 for the purpose of implementing the Option B performance-based requirements.

ALTERNATE TESTING: The Containment Isolation Valves listed in Table VR-61 will be leak rate tested at frequencies specified in accordance with Reg. Guide 1.163, but at base intervals no greater than 60 months.

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**Table VR-61
Containment Isolation Valves**

Valves ID	Valves ID	Valves ID
B2100F010A	E1150F008	E5150F007
B2100F010B	E1150F009	E5150F008
B2100F076A	E1150F016A	E5150F013
B2100F076B	E1150F016B	
B2100F434	E1150F021A	E5150F062
B2103F016	E1150F021B	E5150F084
B2103F019	E1150F022	
B2103F022A	E1150F023	G1100F003
B2103F022B	E1150F024A	G1100F019
B2103F022C	E1150F024B	G1154F018
B2103F022D	E1150F027A	G1154F600
B2103F028A	E1150F027B	
B2103F028B	E1150F028A	G3352F001
B2103F028C	E1150F028B	G3352F004
B2103F028D	E1150F608	G3352F220
B3100F014A	E11F412	G5100F600
B3100F014B	E11F413	G5100F601
B3100F016A	E11F414	G5100F602
B3100F016B	E11F415	G5100F603
B3100F019		G5100F604
B3100F020	E2100F006A	G5100F605
	E2100F006B	G5100F606
C1100F010		G5100F607
C1100F011	E2150F005A	
C1100F180	E2150F005B	P1100F126
C1100F181		
	E4150F002	P34F401A
C4100F006	E4150F003	P34F401B
C4100F007	E4150F006	P34F403A
	E4150F075	P34F403B
C5100F002A	E4150F079	P34F404A
C5100F002B	E4150F600	P34F404B
C5100F002C	E41F400	P34F405A
C5100F002D	E41F401	P34F405B
C5100F002E	E41F402	P34F406A
	E41F403	P34F406B
E1100F408		P34F407

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**Table VR-61
Containment Isolation Valves**

Valves ID	Valves ID	Valves ID
P34F408	T4800F420	T4901F007
P34F409	T4800F421	T4901F016
P34F410	T4800F422	T4901F465
	T4800F423	T4901F468
P4400F282A	T4800F424	T4901F601
P4400F282B	T4800F425	T4901F602
P4400F606A	T4800F426	
P4400F606B	T4800F427	T5000F401A
P4400F607A	T4800F451	T5000F401B
P4400F607B	T4800F453	T5000F402A
P4400F615	T4800F454	T5000F402B
P4400F616	T4800F455	T5000F403A
	T4800F456	T5000F403B
P5000F603	T4800F457	T5000F404A
P5000F604	T4800F458	T5000F404B
		T5000F405A
T2300F409	T4803F601	T5000F405B
T2300F410	T4803F602	T5000F407A
T2300F450A		T5000F407B
T2300F450B	T4804F016A	T5000F408A
	T4804F016B	T5000F408B
T4600F400	T4804F601A	T5000F420A
T4600F401	T4804F601B	T5000F420B
T4600F402	T4804F602A	T5000F455
T4600F411	T4804F602B	T5000F456
T4600F412	T4804F603A	T50F412A
	T4804F603B	T50F412B
T4800F404	T4804F604A	T50F450
T4800F405	T4804F604B	T50F451
T4800F407	T4804F605A	T50F458
T4800F408	T4804F605B	
T4800F409	T4804F606A	
T4800F410	T4804F606B	
T4800F416		
T4800F417		
T4800F418		
T4800F419		