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Wayne H. Jens
Vice President
Nuclear Operations

**Detroit
Edison**

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

July 8, 1985
NE-85-0404

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FILE *102*

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

Dear Mr. Keppler:

- Reference:
- (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-33
 - (2) Detroit Edison to NRC Letter, "Post-Fuel Load Testing", EF2-70449
March 16, 1985

Subject: Post-Fuel Load Testing Update

Reference 2 provided a list of the post-fuel load preoperational tests and test exceptions with appropriate milestones for completion. The reference 2 letter was included by reference in Attachment 1 to the Fermi-2 low power operating license. The list in the letter was a complete list of post-fuel load deferrals of the preoperational tests listed in Chapter 14 of the FSAR.

Attachments A and B of this letter provide an update of the attachments in the reference (2) letter to reflect the plant status prior to exceeding 5% power. The additional test exceptions discussed do not adversely affect the safety design basis of the plant and do not affect system operability requirements in the Technical Specifications.

If you have any questions regarding this matter, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

Wayne H. Jens

cc: Mr. P. M. Byron
Mr. S. G. DuPont
Mr. N. J. Chrissotimos
Mr. M. D. Lynch
Mr. L. Reyes
USNRC, Document Control Desk
Washington, D.C. 20555

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bcc: Approved Control

F. E. Agosti
L. P. Bregni
W. F. Colbert
O. K. Earle
G. R. Ford
J. H. Flynn
E. P. Griffing
W. H. Jens
R. S. Lenart
G. R. Overbeck
T. D. Phillips
J. H. Plona
T. Randazzo
L. J. Simpkin
G. M. Trahey
A. E. Wegele

Region III Chron File
NRC Follow-up Book/NRC File
Secretary's Office (2412 WCB)
NOC Satellite Service Center

ATTACHMENT A

PREOPERATIONAL TEST EXCEPTIONS*
(FSAR Chapter 14 Systems)

TEST NO.	DISCUSSION	COMPLETION
B21.00.001 Nuclear Boiler System TEDR #25, 27	Retest Auto Depressurization Logic status indicating lights. STATUS: TEDR's CLOSED	Operational Condition 2 (prior to exceeding 150 psi)
E1100.001 Residual Heat Removal System TEDR #28	Complete motor operated valve dynamic testing requiring flow to reactor vessel. STATUS: TEDR CLOSED	Operational Condition 2
T4700.001 Drywell Cooling System TEDR #6	Retest temperature recorder and thermo- couple computer inputs. STATUS: TEDR CLOSED	Operational Condition 2
T48.00.001 Primary Containment Atmosphere Control and Nitrogen Supply System TEDR's 13, 15	Retest Primary Containment Isolation Valves following solenoid replacement. Complete motor operated valve testing. STATUS: TEDR's CLOSED	Operational Condition 2
T9200.001 Secondary Containment Leak Rate Test - TEDR #5	Retest various door interlocks. STATUS: TEDR CLOSED	Operational Condition 2
DEMO.PFI.733 PVDET: Core Spray System - Exception B	Complete Core spray System vibration testing requiring flow to reactor vessel. STATUS: CLOSED	Operational Condition 2

* Test Exception Disposition Report (TEDR)

PREOPERATIONAL TEST EXCEPTIONS*
(FSAR Chapter 14 Systems)

TEST NO.	DISCUSSION	COMPLETION
C91.00.001 Process Computer Interface System - TEDR #197	Complete testing of computer inputs from Traversing Incore Probe System	5% power
	STATUS: TEDR CLOSED	
T4100.001 Reactor Building Heating, Ventilation, and Air Conditioning System TEDR No.'s 16, 17	Complete system air balancing. Complete testing of Contaminated Equipment Storage Room Filter	5% power
	STATUS: TEDR's CLOSED	
U4100.001 Turbine Building HVAC System TEDR #11	Complete final system air balancing	Warranty Run**
	STATUS: Original milestone was 5% power. Safety design basis requirements (Building P and flow direction) will be met prior to exceeding 5% power. However, final system air balancing and HVAC system tune-up is dependent on heat-up and opera- tion of all turbine building systems which occurs much later in the power ascension phase - All requirements will be met by warranty run.	
N2100.001 Reactor Feedwater System TEDR #21	Retest hydraulic operated gate valves	Test Condition 1
	STATUS: TEDR CLOSED	

* Test Exception Disposition Report (TEDR)

** Revision to reference (2) letter

PREOPERATIONAL TEST EXCEPTIONS*
(FSAR Chapter 14 Systems)

TEST NO.	DISCUSSION	COMPLETION
N2000.001 Condensate System - TEDR's 17, 22	Retest valve F404 and complete motor operated valve dynamic testing. STATUS: TEDR 22 CLOSED TEDR 17 Remains scheduled for Warranty Run	Warranty Run
P3320.001 Plant Process Sampling system (Reactor Building) TEDR's 4, 5, 7, 9	Retest various sample points following modifications; complete testing of sump samples. STATUS: TEDR's 7, 9 CLOSED Other TEDR's remain scheduled for Warranty Run	Warranty Run
P3321.001 Plant Process Sampling System (Turbine Building) TEDR's 14, 17, 18	Retest various sample points when proper system water quality and sample flows are available; retest annunciator STATUS: UNCHANGED FROM REFERENCE (2)	Warranty Run
P4100.001 General Service Water System TEDR's 1, 4 thru 9	Retest valve controller and traveling screens. Complete various system performance tests when design loads and flowrates are available. STATUS: TEDR's 6, 8 CLOSED - Other TEDR's remain scheduled for Warranty Run	Warranty Run
R3600.001 Plant Normal and Emergency Lighting Systems TEDR 17, 28	Retest of normal A.C. lighting levels. STATUS: TEDR's CLOSED	Warranty Run

* Test Exception Disposition Report (TEDR)

PREOPERATIONAL TEST EXCEPTIONS*
(FSAR Chapter 14 Systems)

TEST NO.	DISCUSSION	COMPLETION
U4100.001 Turbine Building HVAC System TEDR #6	Retest temperature transmitter for Turbine Building steam heating control. STATUS: TEDR CLOSED	Warranty Run
H4000.001 Communication System Including Evacuation Alarm System-TEDR's 7, 8, 10 --> 12, 15 --> 18, 23 --> 34	Retest various handsets, speakers, and desksets. Retest various speakers where output is low and no emergency strobe is visible. STATUS: TEDR's CLOSED	First Re-fueling Out-age
P11.000.001 Condensate Storage System - TEDR's #3, 7	Retest system interface with Fuel Pool Cooling System. STATUS: TEDR's CLOSED	First Re-fueling Out-age
T4100.001 Reactor Building Heating, Ventilation and Air Conditioning System TEDR No.'s 14, 16	Complete testing of Reactor Vessel Head Vent System. STATUS: TEDR's CLOSED	First Re-fueling Out-age

* Test Exception Disposition Report (TEDR)

ATTACHMENT B

Sheet 1 of 4

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
E1000.001 ECCS Suction Line Leak Detection (moisture- sensitive tape)	<p>This detection system is only applicable to the ECCS suction from the torus and is not required for fuel load or the power ascension test program per the Fermi 2 Technical Specifications. Identified and unidentified leak detection functions are addressed by temperature and line-flow increases, sump-level changes, and other methods. This system provides refined leak detection information to assist operator response.</p> <p>STATUS: UNCHANGED FROM REFERENCE (2)</p>	Warranty Run
G1120.001 G1125.001 G1135.001 Liquid and Solid Radwaste	<p>During the interim, a temporary vendor radwaste system will be used. The vendor's Process Control Program and description details of the system were provided to the NRC by letters EF2-71992 (dated October 11, 1984) and EF2-72035 (dated December 18, 1984). The temporary system meets all process quality requirements and will support the plant needs until the permanent system is installed and tested. The portions of the system necessary to support the vendor radwaste system will be complete before Operational condition 2.</p> <p>STATUS: The liquid radwaste system is operational and those portions of the solid radwaste system needed to support portable vendor processing are operational. Some minor test exceptions exist on the G1120 and G1125 systems which do not affect system operability. The solid radwaste system remains milestone for warranty run, though the current schedule indicates completion of preoperational testing as early as September.</p>	Warranty Run (G1135.001), Operational Condition 2 (G1120.001, G1125.001)

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
B3100.001 Reactor Recirculation	<p>The system logic and interlocks, lube oil subsystem and MG sets will have been tested before fuel load, although not required by Fermi 2 Technical Specifications. The flow and pump operation tests will be performed during startup testing due to the core-configuration limitation, i.e., core delta P. The preoperational test results will be reviewed and approved prior to Operational Condition 2.</p> <p>STATUS: <u>COMPLETED</u> Minor test exception exists on stroke timing of recirculation pump suction valve which has no safety design basis.</p>	Operational Condition 2
P3323.001 Post-Accident Sampling System (PASS)	<p>The preoperational testing of PASS will be performed in conjunction with completion of related construction activities. The steps involved with PASS becoming operational have been discussed in detail with NRC Region III and documented in letter EF2-70036, dated October 31, 1984.</p> <p>STATUS: <u>COMPLETED</u></p>	5% power
V4100.001 Rad-waste Building HVAC	<p>The subject HVAC system is necessary to support significant radwaste processing operations. The preoperational testing should, therefore, be completed before exceeding 5% power which is the recognized onset of significant fission and activation product generation.</p> <p>STATUS: HVAC system is operational except for final air balancing. Pertinent safety requirements (Building ΔP and flow direction) will be met prior to exceeding 5% power. All requirements will be met by warranty run.</p>	Warranty Run**

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
E1010.001 Primary Coolant Leak Detection	The Primary Coolant Leak Detection Systems are not required until criticality in Operational Condition 2. Until that time there will be open access to containment for visual detection of leakage plus any leakage will have minimal or no contamination. STATUS: <u>COMPLETED</u>	Operational Condition 2*
T4804.001 Thermal Recom- biners	The system is not required until Operational Condition 2. The postulated conditions to produce substantial hydrogen through a metal-water reaction and radiolytic decomposition can not exist beforehand. STATUS: <u>COMPLETED</u>	Operational Condition 2*
T5000.001 Primary Containment Moni- toring	This system is not necessary unless the plant is operating or there is irradiated fuel. STATUS: H ₂ Monitoring completed prior to OC 2 as required. O ₂ Monitor remains scheduled as indicated.	Operational Condition 2(1), except for O ₂ concentra- tion which shall be operational six (6) months after initial criticality

* When containment integrity is required

POST FUEL LOAD

PREOPERATIONAL TESTING

TEST NO.	DISCUSSION	COMPLETION
C5116.001 Traversing In- core Probe (TIP)	The TIP system is used for recalibration of the LPRM detectors and for monitoring the APLHGR, LHGR, MCPR and MFLPD. It serves no function until the reactor is in the power range.	Complete before entering Test Condi- tion 1(2)
STATUS: <u>COMPLETED</u>		
N6200.001 Off- gas	This system has no function unless the main condenser steam jet air ejectors are in operation.	Complete before entering Test Condi- tion 1(2)
STATUS: <u>COMPLETED</u>		
T2303.001 Primary Con- tainment Vacuum Breakers	The containment vacuum breakers are not required until contain- ment integrity is required (i.e., Operational Condition 2).	Operational Condition 2(1)
STATUS: <u>COMPLETED</u>		
T4102.001 Control Center HVAC System	Control Center HVAC will be operable as required by the Technical Specification - prior to criticality in Operational Condition 2.	Operational Condition 2
STATUS: <u>COMPLETED</u>		

(1) When containment integrity is required.

(2) See FSAR Figure 14.1-2.