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Nuclear Generation

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(313) 586-5249

November 1, 1996  
NRC-96-0117

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

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) NRC Bulletin 96-03: Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling Water Reactors, dated May 6, 1996
  - 3) Utility Resolution Guidance (URG) for ECCS Suction Strainer Blockage, prepared by Boiling Water Reactor Owners' Group (BWROG), draft dated October 1996 (transmitted to the NRC by GE Letter OG96-689-161 dated October 7, 1996)
  - 4) Regulatory Guide 1.82, Revision 2, May 1996, Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident
  - 5) Detroit Edison Letter NRC-95-0127, Fermi 2 30-Day Response to NRC Bulletin 95-02, dated November 16, 1995

Subject: Detroit Edison 180-Day Response for NRC Bulletin 96-03

This letter provides the written report required within 180 days of the date of issue of NRC Bulletin 96-03. The Bulletin requires that the 180-day response report (1) indicate whether Fermi 2 intends to comply with the requested action (of implementing appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA); (2) describe planned actions and mitigative

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strategies to be used; (3) provide a schedule for implementation; and (4) include proposed Technical Specifications, if appropriate.

The Fermi 2 response to each of the four items follows.

1. Detroit Edison intends to comply with the requested action. We plan to use a large-capacity passive strainer (Option 1 of Bulletin 96-03) for each of the eight Fermi 2 suppression pool suction strainers (RHR, Core Spray, HPCI, and RCIC). As described in items 2 and 3 below, compliance will be achieved through either verifying the adequacy of the existing passive strainers or, if required, replacing or modifying them.
2. Fermi 2 plans to utilize the final version of the Boiling Water Reactor Owners' Group (BWROG) Utility Resolution Guidance document (URG) as the means of satisfying the recommendations of Regulatory Guide 1.82, Revision 2. The URG will be used to evaluate the existing passive strainer design, and if necessary, the strainers will be modified or replaced.
3. Modifications, if required, will be installed during the first refueling outage subsequent to January 1, 1997, as required by the Bulletin. The Sixth Refueling Outage (RFO6) is presently scheduled for the spring of 1998.

As of the date of this submittal, the final version of the BWROG URG (Reference 3) is not available, and has not yet been formally endorsed by the NRC as a means of satisfying the recommendations of Regulatory Guide 1.82, Revision 2. The BWR Owners' Group plans to submit a final-form URG document and its supporting references prior to the end of November 1996. Fermi plans to use these documents as the basis for commencing the requisite engineering studies to confirm the adequacy of the existing strainers or to support design activities for strainer modifications or replacements. It is assumed that either formal NRC acceptance of the URG or NRC agreement with its technical content will be in place by early 1997 to support completion of the compliance evaluation and commencement of design activities, if required.

If the existing strainers require modification or replacement, detailed design engineering will then be performed on a normal schedule to support procurement activities and final implementation during RFO6. As stated in the previous paragraph, feasibility to implement changes, if required, depends on availability of NRC accepted URG guidelines early in 1997.

The item 4 response discusses the approach and schedule for proposed surveillance Technical Specifications for the Fermi 2 large-capacity passive

Strainer design

Fermi will submit a written report within 30 days of completion of all requested actions, in accordance with Bulletin 96-03 Required Response (2). This report is anticipated to be submitted in mid-1998 following the completion of any necessary strainer modifications in RFO6.

4. As described in the 30-day response to NRC Bulletin 95-02 (Reference 5), Fermi 2 committed to visually inspecting the suppression pool strainers during each refueling outage and having a process in place to determine when suppression pool cleaning is needed. These commitments have already been implemented as part of the Fermi 2 Preventive Maintenance (PM) Program, and were in place at the start of the presently ongoing refueling outage (RFO5). It should be noted that the present process of determining whether suppression pool cleaning is required is based on factors in addition to strainer performance, such as periodic torus coating inspections and repair.

Fermi 2 has already implemented the intent of Bulletin 96-03 Attachment 1 surveillances SR 3.5.1.13 (a) and (b) as part of the PM program. However, recognizing the importance of long-term maintenance of these surveillances, Fermi 2 plans to address these surveillances as part of the Improved Technical Specification (ITS) submittal scheduled for May, 1997. From the Fermi perspective, these can be reviewed by the NRC as part of the ITS and implemented independent of the RFO6 strainer modification activities at any time. This is both because the surveillances will be performed as part of the Fermi PM Program whether or not the surveillances are required by Technical Specifications and because Technical Specification surveillance requirements, if implemented on the existing strainers, would not be expected to change if the strainers were modified or replaced to meet the "Option 1" large passive strainer guidance.

The following commitments have been made in this 180-day response to NRC Bulletin 96-03:

- Evaluate the adequacy of the eight Fermi 2 suppression pool strainers (RHR, Core Spray, HPCI and RCIC) relative to the recommendations of Regulatory Guide 1.82 Revision 2, and modify the strainers as required prior to startup from RFO6. (Fermi intends to use the BWROG URG to support these activities; the schedule commitment assumes availability of NRC accepted URG guidelines by early 1997.)
- Address Bulletin 96-03 Attachment 1 suggested surveillance SR 3.5.1.13 (a) and (b) as part of the Fermi ITS submittal.

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November 1, 1996

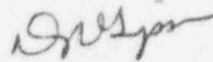
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- Submit a written report within 30 days of completion of all NRC Bulletin 96-03 requested actions.

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

Sincerely,



cc: A. B. Beach  
M. J. Jordan  
A. J. Kugler  
A. Vogel

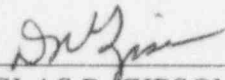
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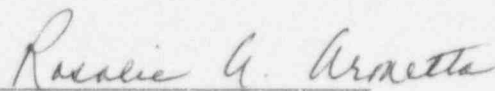
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I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

  
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DOUGLAS R. GIPSON  
Senior Vice President

On this 1<sup>st</sup> day of November, 1996 before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.

  
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Notary Public

ROSALIE A. ARMETTA  
NOTARY PUBLIC - MONROE COUNTY, MI  
MY COMMISSION EXPIRES 10/11/99