



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NOV 21 1985

Docket No.: 50-341

Dr. Wayne Jens
Vice President - Nuclear Operations
The Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Dear Dr. Jens:

Subject: Isolation Requirements for Primary Containment Penetration X-35G

In reviewing your FSAR, we have determined that you submitted a revision in Amendment 51 (October 1983) to the FSAR which represents a deviation from the requirements of General Design Criterion (GDC) 56 of Appendix A to 10 CFR Part 50. Specifically, you stated in Amendment 51 that you were modifying penetration X-35G through primary containment so that containment isolation for this line is provided by a single check valve outside containment. Furthermore, you state in Table 6.2-2 of your FSAR that you comply with the requirements of GDC 54 but do not indicate whether you comply with GDC 56. This latter design criterion is very specific with regard to the need for two isolation valves on lines penetrating primary containment; namely, you must provide one valve inside and one valve outside containment. Our position on this matter is that by providing only a single check valve outside containment, you are in violation of our regulations. Accordingly, we require that you revise the isolation capability of penetration X-35G in accordance with the requirements of GDC 56.

In responding on this matter, you may consider requesting an exemption from the requirements of GDC 56. However, if you do request such an exemption, you should provide a detailed justification to form the basis for your exemption request. In this regard, your response should consider the requirements of Item II.E.4.2, "Containment Isolation Dependability," of NUREG-0737, "Clarification of TMI Action Plan Requirements." Specifically, Position (3) of Item II.E.4.2 requires that "all nonessential systems shall be automatically isolated by the containment signal." It is our position that the Traveling Incore Probe (TIP) purge line (i.e., X-35G) is a non-essential line and that Item II.E.4.2(3) is therefore applicable.

To satisfy our requirements on this matter, we would accept the replacement of the present outboard containment isolation valve with an isolation valve which would close automatically on receipt of the required diverse isolation signals in accordance with our guidance in Item 2 in the clarification section of Item II.E.4.2. We would also find acceptable, a check valve to satisfy the requirement for an isolation valve inside containment.

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Dr. Wayne Jens

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In order that we may obtain a timely resolution of this matter, provide an initial response within one week of receipt of this letter indicating when you will respond substantively on the issues in question. Your substantive response should include a discussion of when you will be able to come into compliance with GDC 56.

If you have any questions on these matters, contact the Fermi-2 Project Manager, M. D. Lynch, at (301) 492-7050.

Sincerely,

/s/

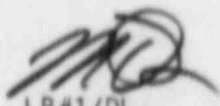
B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

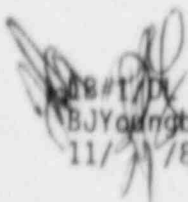
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Dr. Wayne Jens
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