

Detroit
Edison

Wayne H. Jens
Vice President
Nuclear Operations

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



Nuclear
Operations

November 27, 1985
VP-85-0199

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: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Comments on SSER 6

Detroit Edison recently completed a review of Supplement 6 to the Fermi 2 Safety Evaluation Report - NUREG 0798 (SSER 6). The review was conducted to identify differences in fact between SSER 6 and the Fermi 2 Final Safety Analysis Report, Technical Specifications and correspondence.

The comments provided complement previous comments on the SER and its Supplements 1 through 5.

Please direct any questions to Mr. R. L. Woolley at (313) 586-4211.

Sincerely,

Attachments

cc: Mr. P. M. Byron
Mr. M. David Lynch

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Current SSER 6 Discussion

"The licensee has agreed to add the lube oil system and the combustion air intake system and make other minor clarifications to the list of items subject to the operational QA program".

Detroit Edison Comments

The referenced statement pertains to proposed diesel generator modifications and, as such, is not relevant to the discussion of the Independent Design Verification Program in Appendix R.

Current SSER 6 Discussion

"The Onsite Organization is being changed by elevating the position of the Plant Superintendent to an Assistant Manager plus combining under his/her authority, functions which deal with plant modifications and Outage Management. This latter item increases the responsibility of the previous Maintenance Engineer and thus elevates his/her position to a Superintendent level".

Detroit Edison Comments

In lieu of elevating the Maintenance Engineer position to a Superintendent level as indicated above, Detroit Edison created a Superintendent position to which the Maintenance Engineer now reports.

Current SSER 6 Discussion

"CYGNA has agreed to provide a clarification of its overall conclusions related to the acceptability of those observations identified as potential findings. CYGNA also has agreed to update its root cause classification list by categorizing the root cause of the design control observations".

Detroit Edison Comments

By copy of a letter from CYGNA Energy Services to the NRC, dated May 17, 1985 (No. 83021.060), Detroit Edison believes the requested information has been provided to the NRC. If additional information is required, notify CYGNA of what is needed.

Current SSER 6 Discussion

"The Licensee's position is that the Fermi-2 leakage reduction program tests gaseous systems by measuring, to within two standard cubic centimeters per minute (SCCM)....."

Detroit Edison Comments

This statement should be revised to read within "twenty standard cubic centimeters" instead of "two". This was a typographical error in the June 3, 1985 submittal.

Detroit Edison Comments

The following letters should be included in the chronology.

<u>Date</u>	<u>Letter No.</u>	<u>Subject</u>
04/02/85	NE-85-0466	Additional Information Relative to Inservice Testing Program
04/22/85	NE-85-0463	Testing of Control Center Emergency Filtration System
05/07/85	NE-85-0707	Resubmittal of Fermi 2 Vacuum Breaker Report
05/07/85	NE-85-0706	Schedule for License Condition 2.C(7)
05/16/85	NE-85-0708	Post-Accident Sampling and Analysis of Plant Effluents (Radiodines and Particulates)
05/17/85	CYGNA,83021.060	NRC Review Questions and Comments Independent Design Verification Program
05/21/85	NE-85-0705	Edison Schedule for Response to Items in Supplement 1 to NUREG--0737
06/03/85	NE-85-0391	Additional Information Regarding Fermi 2 Leakage Reduction Program
06/03/85	NE-85-0711	Comments on SSER 5
06/06/85	NE-85-0710	Technical Specification Change Request
06/10/85	VP-85-0132	Detroit Edison Response Inspection Report 50-341/85009
06/12/85	NE-85-0722	Fermi 2 Process Control Program

06/14/85	NE-85-0143	Emergency Preparedness Exercise for Fermi 2
06/18/85	NE-85-0142	Additional Clarification Concerning Fire Doors and Fire Detectors
06/18/85	VP-85-0144	Medical Arrangements for Contaminated Injured Individuals
06/21/85	NE-85-0896	Additional Technical Specification Changes
06/24/85	NE-85-0900	Additional Information Concerning Electrical Separation
06/26/85	NE-85-0904	Evacuation and Localized Flood Conditions
06/27/85	NE-85-0399	Additional Technical Specification Change
06/27/85	NE-85-0906	Nuclear Liability Insurance Secondary Financial Protection
06/28/85	VP-85-0140	Primary Containment Coatings Transmittal of Final Report No. DECo-12-2191, Revision 4, "Evaluation of Containment Coatings"
06/28/85	NE-85-0907	Representative Sample No. 11 of the Electrical Separation Review