



February 4, 1986  
VP-86-0003

Director of Nuclear Reactor Regulation  
Ms. Elinor G. Adensam, Director  
Project Directorate No. 3  
Division of BWR Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Ms. Adensam:

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

Subject: Request for Amendment to Fermi 2  
Technical Specification Table 3.6.3-1

In accordance with 10CFR 50.91 and 10CFR 50.92, Detroit Edison hereby requests an amendment to the Fermi 2 Technical Specifications.

The primary containment hydrogen - oxygen monitoring system (T50-02) for sampling the drywell which was present at the time of issuance of the Operating License was not environmentally qualified. This system is required to continuously monitor hydrogen and oxygen concentration during a LOCA and post-LOCA. Detroit Edison has subsequently replaced the environmentally unqualified hydrogen - oxygen monitoring system with an environmentally qualified system that meets the requirements of IEEE 323-1974, IEEE 344-1975, and NUREG-0588, Category 1.

As a result of the modification, two remote-manual containment isolation valves, T50-F406A and T50-406B, are no longer included in this system. The lines on which these valves are installed have been capped outboard of these valves. Detroit Edison requests that Table 3.6.3-1 be amended to delete these two valves. Deletion will allow physical removal of the valves and capping of the line inboard of the valves. Attachment 1 is a markup of Table 3.6.3-1 reflecting this change.

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Significant Hazards Analysis

Detroit Edison has evaluated the proposed change for significant hazards considerations. Elimination of the containment isolation valves would not increase the probability or consequences of an accident evaluated in our FSAR. Instead, elimination of these valves would be expected to reduce the probability of releases of radioactivity due to the elimination of active components which could fail. Actual radioactive releases through containment leakage would also be expected to be less due to elimination of a potential leak path.

Elimination of the containment isolation valves would not create the possibility of a new or different kind of accident from any previously analyzed. Elimination of these valves does not introduce new or different accident initiators.

Elimination of the containment isolation valves would not involve a significant reduction in a margin of safety. On the contrary, elimination would prevent leakage from this potential leak path in the containment and therefore would be expected to increase the margin of safety at Fermi 2.

Detroit Edison therefore concludes that elimination of containment isolation valves T50-F406A and T50-F406B from the Technical Specifications involves no significant hazards considerations.

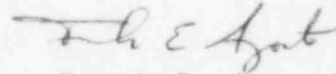
Detroit Edison has evaluated this request in accordance with the criteria in 10CFR170.21 and has enclosed an application fee of one hundred fifty dollars (\$150.00) as initial payment for this application for amendment under Facility Category A (Power Reactors).

In accordance with 10CFR50.91, the State of Michigan has been provided a copy of this letter.

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Should you have any questions in this matter, please  
contact Mr. R. L. Woolley, (313) 586-4211.

Sincerely,



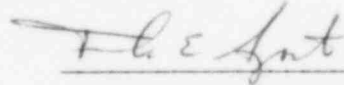
Frank E. Agosti  
Vice President  
Nuclear Operations

Attachments

cc: Mr. P. M. Byron  
Mr. M. David Lynch  
Supervisor, Advance Planning and Review Section  
Michigan Public Service Commission

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I, FRANK E. AGOSTI, 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.



FRANK E. AGOSTI  
Vice President  
Nuclear Operations

On this 4<sup>th</sup> day of February, 1986, before me personally appeared Frank E. Agosti, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

MARCIA BUCK  
Notary Public, Washtenaw County, MI  
My Commission Expires Dec. 28, 1987

*Acting in Monroe  
County, Mi*