

**Detroit
Edison**

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May 22, 1979
EF2-46,143

Mr. G. Fiorelli, Chief
Reactor Construction and
Engineering Support Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

Noncompliances at Enrico Fermi Unit II Construction Site

This letter responds to the one infraction and one deficiency contained in your IE Report No. 50-341/79-09. This inspection of Enrico Fermi Unit II Construction activities was performed by Messrs. R. J. Marsh, K. D. Ward, and M. J. Corcoran on January 3 and 4, 1979.

The cited infraction and deficiency mentioned in your report are discussed in this reply, as required by Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. No unresolved items were identified in your report. However, the concern expressed as to the action to be taken to assure that NDE services provided in the past, meet applicable requirements, is addressed in "Corrective Action Taken And Results Achieved" on page two, paragraph (b) of the enclosed report.

The enclosed report is arranged to correspond to the sequence of items cited in Appendix A of your report. Finding numbers have been assigned to both noncompliances and are referenced along with the allegation numbers from page four of the body of your report.

We trust this letter satisfactorily answers the concerns raised in your report. We shall be glad to discuss any further points that you may have.

Sincerely yours,

Edward Hines

RWB/pm

Attachment

cc: Mr. John G. Davis, Acting Director
Office of Inspection and Enforcement
Division of Reactor Inspection Programs
U.S. Nuclear Regulatory Commission
Washington D. C. 20555

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THE DETROIT EDISON COMPANY
QUALITY ASSURANCE DEPARTMENT
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/79-09

Docket No. 50-341 License No. CPPR-87

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection conducted: January 3 and 4, 1979

Prepared by:

H. A. Walker

H. A. Walker
Site Project Q.A. Engineer
Detroit Edison Company

Approved by:

R. W. Barr

R. W. Barr
Project Q.A. Director
Detroit Edison Company

Response to NRC Report # 50-341/79-09

Statement of Infraction 79-09-01

Appendix A, Item # 1

Allegations # 1 and 2

Infraction: Contrary to 10CFR50, Appendix B, Criterion IX, measures were not sufficient to assure that welding and non-destructive testing activities were accomplished by qualified personnel. Improper qualifications were as follows:

- a. A General Electric individual was continuing to perform liquid penetrant examinations after his Level II liquid penetrant certification had expired.
- b. A Materials Assurance Company individual was performing liquid penetrant examinations even though he did not have the experience, training, and an eye test as shown on his certification records and as required by ASME Sections III and V.

Corrective Action Taken and Results Achieved

- a.
 - Certification was updated and sent to the site on January 4, 1979.
 - Generated NCR-II-121 dated January 17, 1979; DDR (W)2576 dated February 22, 1979. These listed the PT's and UT's performed by the individual during the period of lapsed certification. Proposed resolution was to accept them based on individual's experience and the fact the lapse was only due to an administrative oversight. This resolution was approved by GE-I&SE, Daniel, Detroit Edison, and the ANI.
- b. Allegations 1 and 2
 - The NDE personnel from Materials Assurance Company (MAC) (identified as M-2, M-3), were removed from the site when it was known there was some question of their certification. This was completed January 4, 1979 at Fermi, and all other sites February 28, 1979.
 - A complete reaudit of MAC personnel certification documentation at another site was completed. Items checked were documentation on eye examination, certifications, including copies of examinations, work experience, and training. This was completed February 15, 1979.
 - In-process audits were performed on M-2 and M-3 at another site. They were found to be technically capable of performing the NDE examination to which they were certified. Also, M-3 was completely re-certified including eye test and certification examination. The in-process audits and examination were monitored by General Electric NDE Level III personnel. This was completed February 15, 1979.

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Response to NRC Report 79-09 (cont'd)

Corrective Action Taken and Results Achieved Cont...

- G.E.-I&SE will develop a plan for the GE-I&SE Project Q.C. Supervisor to evaluate the examinations previously performed by all MAC NDE personnel used at the Fermi II Site. This plan will include a list of the welds to be re-inspected with the results to be evaluated. Also, the plan will include acceptance criteria for the remainder of the welds based on the results of the inspected welds. NCR's/DDR's will be initiated to resolve unacceptable results. This plan will be submitted for Daniel/Edison approval by May 25, 1979. Re-inspection and evaluation of hardware will be completed by July 13, 1979.

Corrective Action to be Taken to Avoid Further Noncompliance

- a. ● The individual will be re-instructed of the "requirement of certification" as per I&SE PQ 8000.
- A tickler file will be established in the Region Office to ensure the eye examination and certification will be performed at required intervals.
- b. ● A new NDE subcontractor has been hired for the Fermi II Project. This subcontractor has been subjected to a more rigorous review which includes requiring proof of documentation for certification (eye examinations, certification examinations, work experience, and training). This was completed January 8 through 12, 1979 prior to their use on site.
- A letter will be sent to all site NDE subcontractors stating they must show proof of: eye examinations, work experience, training, and certification including copies of the examination. This will be accomplished by May 25, 1979.
- G.E. Corporate survey and site auditing systems will be improved. Personnel involved in these systems will be instructed that the NDE company and their personnel reporting to the site must show proof of documentation. This will include names and addresses of eye examiners, certification of prior work experience, proof of formal training (i.e. diplomas), and proof that certification examinations were performed by qualified personnel. This will be done on an individual case basis.
- The Materials Assurance Company has been removed from GE-I&SE's Approved Vendor List.

Date When Full Compliance Will be Achieved

- a. ● The certification was updated and individual was reinstructed on January 4, 1979 on the requirement of PQ 8000.
- NCR and DDR were completed on February 28, 1979.
- Tickler file will be completed on May 25, 1979.

Response to NRC Report # 50-341/79-09 (cont'd)

Corrective Action to be Taken to Avoid Further Noncompliance cont..

- b ● Materials Assurance Company was removed from the Fermi II Site on January 4, 1979.
- Hiring and qualification of the new NDE contractor for the Fermi Site was completed on January 12, 1979.
- The letter to site NDE subcontractors will be sent by May 25, 1979.
- The improvements in the G.E. Corporate survey and site auditing system have been improved as stated. Additional improvements will be made as considered necessary.
- The Materials Assurance Company was removed from the GE-I&SE Approved Vendor list on May 18, 1979.
- Disposition of hardware items tested by personnel whose certifications are in question will be completed by July 13, 1979.

Statement of Deficiency 79-09-02

Appendix A, Item # 2

Allegation # 3

Deficiency: Contrary to 10CFR50, Appendix B, Criterion XVII, the Material Assurance Company NDE Specialist did not maintain records of an individual's test in Liquid Penetrant (PT) examination and that he was certified.

Corrective Action Taken and Results Achieved:

- A complete reaudit of MAC personnel certification documentation at another site was performed by GE-I&SE. Items checked were documentation on eye examination, certifications, including copies of examinations, work experience, and training. This was completed February 15, 1979.
- In-process audits were performed on M-2 and M-3 at another site. They were found to be technically capable of performing the NDE examination to which they were certified. Also, M-3 was completely re-certified, including eye test and certification examination. The in-process audits and examination were monitored by General Electric NDE Level III personnel. This was completed February 15, 1979.

Corrective Action to be Taken to Avoid Further Noncompliance

- A letter will be sent to all site NDE subcontractors stating they must show proof of: eye examinations, work experience, training, and certification including copies of the examination. This will be accomplished by May 25, 1979.

Response to NRC Report # 50-341/79-09 (cont'd)

Statement of Deficiency 79-09-02 (cont'd)

Corrective Action to Taken to Avoid Further Noncompliance Cont'd

- G.E. Corporate survey and site auditing systems will be improved. Personnel involved in these systems will be instructed that the NDE company and their personnel reporting to the site must show proof of documentation. This will include names and addresses of eye examiners, certification of prior work experience, proof of formal training (i.e. diplomas), and proof that certification examinations were performed by qualified personnel. This will be done on an individual case basis.
- The NDE personnel from Material Assurance Company (MAC) were removed from the site when it was known there was some question in their certification. This was completed January 4, 1979 at Fermi and all other sites February 28, 1979.
- A new NDE subcontractor has been hired for the Fermi II Project. This subcontractor has been subjected to a more rigorous review which includes requiring proof of documentation for certification (eye examinations, certification examinations, work experience, and training). This was completed January 8 through 12, 1979 prior to their use on site.

Date When Full Compliance Will be Achieved

Full Compliance will be achieved by May 25, 1979.