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July 12, 1979  
EF2- 46,911

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:

Subject: Noncompliances at Enrico Fermi Unit II Construction Site

This letter responds to the three (3) infractions contained in your IE Report No. 50-341/79-13. This inspection of Enrico Fermi Unit II Site Construction activities was performed by Messrs. H. S. Phillips and J. J. Harrison on May 8 - 11, 1979.

Only the cited infractions 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. There were no unresolved items identified in your report. We will be prepared to report in detail on our progress and corrective action on the noncompliances to your inspectors on their next visit.

The enclosed response is arranged to correspond to the sequence of items cited in the body of your report. The finding numbers from the report are referenced as well as the section numbers.

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*

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. 50-341/79-13

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection conducted: May 8 - 11, 1979

Prepared by:

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Approved by:

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Project Q.A. Director  
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Statement of Infraction 79-13-01 and 79-13-04

Appendix A, Item 1:

Pages 2 - 6, paragraph 1(a-e) (79-13-01)

Pages 10 and 11, paragraph 4(a & b) (79-13-04)

Infraction: Contrary to 10CFR50, Appendix B, Criterion V, the procedures controlling activities which affected quality were not followed or they were determined to be inadequate. Wismer and Becker personnel had not received the minimum training prescribed by their Q.A. program and four Level II welding inspectors did not appear to meet the experience requirements for their positions. Wismer and Becker procedures were not followed for identifying penetrameters or for preparation of shooting sketches and they did not describe the proper penetrometer positioning for use with small bore pipe.

1a.

Corrective Action Taken and Results Achieved

Wismer and Becker is currently conducting a review of training records and is performing the required training in those areas which are found to be deficient.

The Wismer and Becker Q.A. Manual has been revised to reflect more appropriately the needs of the various departments requiring training.

Corrective Action Taken to Avoid Further Noncompliance

All Department Managers involved have been instructed to adhere to the requirements of the Quality Assurance and Control Manual. Department Managers have also been instructed to notify the Training Coordinator of newly hired personnel so that the training can be administered.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 30, 1979.

1b.

Corrective Action Taken and the Results Achieved

The Wismer and Becker Quality Assurance and Control Manual has been revised to reflect the requirements of ANSI 45.2.6. It should be noted that the Wismer and Becker Q.A./Q.C. Manual was more restrictive than ANSI 45.2.6 with respect to minimum education and experience requirements. The Wismer and Becker Q.A./Q.C. Manual and the Quality Assurance Training Manual (QA-TM-1) required the minimum educational/experience as mandatory while the ANSI Standard states; i.e. that qualification at various levels may be based on other factors.

In light of the revised Q.A./Q.C. Manual, the qualifications of the Level II welding inspectors were reviewed and accepted based on documented test results, previous education, and experience. Also, resumes have been placed in the files for all currently employed Wismer and Becker Q.C. and NDE inspectors.

1b. (cont'd)

Corrective Action Taken to Avoid Further Noncompliance

The training procedure, QA-TM-1, will be revised to reflect the latest revision to the Q.A./Q.C. Manual. This revision, along with the revised Q.A./Q.C. Manual, will provide a more realistic base for qualification of inspection personnel. Wismer and Becker will continue a concerted effort to hire inspection personnel with strong educational and experience backgrounds.

Also, a Training Coordinator Clerk has been appointed to assist the Training Coordinator in maintaining the required records in the training files.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 30, 1979.

1c.

Corrective Action Taken and Results Achieved

All penetrameters have been inspected to determine if identification numbers are attached. Those found with missing identification will be replaced with new penetrameters.

Corrective Action Taken to Avoid Further Noncompliance

Wismer and Becker has instructed the NDE subcontractor personnel to check for permanent penetrameter identification prior to use.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 13, 1979.

1d.

Corrective Action Taken and Results Achieved

A memorandum was sent from Wismer and Becker to the subcontractor performing the radiography which provided instructions for positioning the penetrameters. Also, all penetrameters have been inspected and those which were found bent were discarded.

Corrective Action Taken to Avoid Further Noncompliance

Procedure WB-Q-110 will be revised to reflect the use and position of a penetrameter longitudinal rather than transverse to the axis of the pipe.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 13, 1979.

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Statement of Infraction 79-13-01 and 79-13-04  
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1c.

Corrective Action Taken and Results Achieved

Wisner and Becker's NDE Level III examiner will establish a master listing of the required shooting sketches. This listing will be used as the bases for determining which sketches are not available. Those sketches which are not available will be developed and maintained on file.

Corrective Action Taken to Avoid Further Noncompliance

To adhere to the requirements of the procedure, the Wisner and Becker Level III examiner will review and update the master listing and develop additional sketches as necessary.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 30, 1979.

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Statement of Infraction 79-13-02

Appendix A, Item 2:

Pages 6 - 8, paragraph 2(a-c)

Infraction: Contrary to 10CFR50, Appendix B, Criterion IX, special processes including nondestructive testing were not controlled and accomplished by qualified personnel. Certifications for four Daniel Level II NDE inspectors did not meet procedure requirements. Wismer and Becker NDE personnel were not tested or certified as required by their Q.A. program. Nuclear Energy Services NDE personnel records failed to indicate visual acuity test results.

2a.

Corrective Action Taken and Results Achieved

On June 12, 1979 Messrs. Seifert, Hritz, Kennedy, and Blixt received new certification cards signed by W. J. Taylor, Daniel Corporate Level II, stating: "Restricted to film interpretation only".

It should be noted that Daniel Q.C. personnel have never performed any physical radiography at the Fermi II Site.

Corrective Action Taken to Avoid Further Noncompliance

The Daniel Corporate Written Practice for certifying NDE personnel will be revised to provide for restricted certification. The procedure will require that any such restrictions be noted on the certification cards.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on August 10, 1979.

2b.

Corrective Action Taken and Results Achieved

The individual who failed one of the examinations for NDE Level I certification and was retested after fifteen (15) days, had received additional training from a Wismer and Becker Level III person. However, documented evidence of this fact was not available as required. As a result, the Wismer and Becker Level III person who administered the additional training has attested to this fact and a copy of a memorandum so stating has been placed on the certification file.

Corrective Action Taken to Avoid Further Noncompliance

The Wismer and Becker Level III examiner has been instructed on the requirements of QA-TM-2 and it has been emphasized that any type of training is to be documented.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 5, 1979.

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Statement of Infraction 79-13-02

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2c.

Corrective Action Taken and Results Achieved

The Wismer and Becker Corporate Quality Assurance and Control Manager has recertified the Wismer and Becker Site Level III examiner.

Corrective Action Taken to Avoid Further Noncompliance

In the future, the Corporate Quality Assurance and Control Manager will administer the examination for Level III personnel employed at the Fermi II Site and, based on acceptable results, certify the individual(s).

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 6, 1979.

2d.

Corrective Action Taken and Results Achieved

Wismer and Becker is performing a review of all tests given to Quality Control inspection personnel and NDE inspectors. This review will consist of rechecking test answers against master answer sheets and verifying correct addition of test points. In any instances where an incorrect answer is found that was not marked wrong, and this results in a test score less than the minimum passing percentage, the individual(s) will be retested. In addition, any of the affected personnel will be notified of correct answers to questions not previously marked wrong.

Corrective Action Taken To Avoid Further Noncompliance

Wismer and Becker is reviewing all tests which are given in order to accomplish the following:

- (1) Establish point values for test questions on a master answer sheet so that all tests will reflect a 100% maximum obtainable score.
- (2) Test questions are being analyzed to determine if they can be reworded in order that the answers are more objective rather than subjective.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 30, 1979.

2e.

Corrective Action Taken and Results Achieved

The specific and general examinations which were given to NDE personnel have been reviewed for their content to determine those which do not meet the requirements of SNT-TC-1A. The Wismer and Becker Q.A./Q.C. Manager has determined that the inappropriate test was only administered in the one identified instance.

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The individual in question has been retested with a specific examination which meets SNT-TC-1A.

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2e. (cont'd)

Corrective Action Taken and Results Achieved

The requirement for maintaining an accurate work log has been emphasized to responsible inspection personnel.

Corrective Action Taken to Avoid Further Noncompliance

Different versions of the specific and general examinations were previously on file including the one which was unacceptable. This examination has been removed from Wismer and Becker's site files to prevent the possibility of it being administered again.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 13, 1979.

2f.

Corrective Action Taken and Results Achieved

A review has been made of all NES personnel records to assure that the requirements of the procedure are met. Any deficiencies noted have been corrected and acceptable records, including results of visual acuity tests are on file.

The NES Level III examiner has determined that the individuals in question had only been engaged in radiographic testing. For this method, personnel are only required to distinguish between black and white for the color contrast portion of the eye examination. Therefore, previous work performed by these individuals is acceptable.

Corrective Action Taken to Avoid Further Noncompliance

Wismer and Becker has issued a memorandum to NES directing them to adhere to their procedural requirements.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 13, 1979.

907359



Statement of Infraction 79-13-03

Appendix A, Item 3:

Pages 9 and 10, paragraph 3(a-c)

Infraction: Contrary to 10CFR50, Appendix B, Criterion XII, the measuring and testing devices used in evaluating radiography tests were not properly calibrated and adjusted at specific periods to maintain accuracy within necessary limits. Daniel and Wismer and Becker procedures failed to address periodic recertification of step wedge density film strips. Wismer and Becker and Nuclear Energy Services were using uncalibrated step wedge film to calibrate densitometers.

3a.  
Corrective Action Taken and Results Achieved

Daniel Quality Control obtained a replacement density strip (S/N 518) on May 17, 1979 with respective calibration records. On May 21, 1979, the densitometer (Model TD 502) was verified as being within the required density range.

Corrective Action Taken to Avoid Further Noncompliance

The step wedge film will be sent off-site in the future for verification that densities are within acceptable ranges. Daniel Procedure QCP-VI-01, "Quality Control Procedure for Interpretation of Radiographic Film", will be revised to reflect this requirement. In addition, AP-VII-04, "Calibration and Control of Measuring and Test Equipment", will also contain instructions for yearly verification of step wedge film.

Date When Full Compliance Will Be Achieved

Procedural revisions should be complete by August 15, 1979.

3b.  
Corrective Action Taken and Results Achieved

Wismer and Becker has also purchased new calibrated step wedge film. This film was used to check the calibration of densitometers being used. The results of this check revealed that the densitometers were within the required density range. Since the results of the calibration check of the densitometer being used on site has been found acceptable, further action regarding previously accepted radiographs is not required.

Corrective Action Taken to Avoid Further Noncompliance

Wismer and Becker has issued two (2) interim changes to WB-E-104 to incorporate NDE equipment, including step wedges, into the calibration program.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved on July 6, 1979.