

**Detroit  
Edison**

**Edward Hines**  
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September 28, 1979

EF2-46,349

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: Noncompliance at Enrico Fermi Unit II Construction Site

This letter responds to the infraction contained in your IE Report No. 50-341/79-16. This inspection of Enrico Fermi Unit II Site Construction activities was performed by Mr. I. T. Yin on August 1-3, 1979.

Only the cited infraction mentioned in your report is 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. The unresolved item has been acted on. We will be prepared to report in detail on our progress and corrective action on this matter 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. 50-341/79-16

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

Inspection at: Fermi II Site, Monroe, Michigan

Inspection conducted: August 1-3, 1979

Prepared by: *H. A. Walker*

H. A. Walker  
Site Project Q.A. Engineer

Approved by: *R. W. Barr*

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

1252 035

Statement of Infraction 79-16-01

Appendix A:

Pages 3-5 paragraphs 1 (a-k)

Infraction: Contrary to 10CFR50, Appendix B, Criteria XVI, the deficiencies identified relative to the installation of safety related hangers had not been corrected from November, 1978. In addition, the corrective action to avoid recurrence and to allow lifting of two previously issued stop work orders dated September 8, 1978 and March 15, 1979 were ineffective in stopping similar problems from recurring.

Corrective Action Taken and Results Achieved

Item 1a:

The work releases for the numerous safety related hangers previously released for installation were rescinded during the inspection.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1a:

A program has been implemented which requires the Edison Site Project Quality Assurance Engineer to approve all releases for pipe support installation. There are to be no more than ten (10) large bore, twenty (20) small bore, and twenty (20) instrumentation and control supports being installed at any one time. In addition, Edison Letter F2S9-1406 dated August 21, 1979 and Daniel Letter DIC9-5667 dated August 24, 1979 describe the various methods used to identify, control and maintain QA Level I Supports. These letters are available on Site for your inspectors to review on their next inspection.

Date When Full Compliance Will Be Achieved

Item 1a:

The control system described above has been implemented.

Corrective Action Taken and the Results Achieved

Item 1c:

WB-Q-112 has been revised to show those categories of deficiencies used during inspection of hanger per form EF-136 in WB-C-114. A new trend analysis is being developed to meet the new categories which appear in WB-Q-112.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1c:

Future trend analysis will meet the WB-Q-112 requirement.

1252 036

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 2, 1979.

Corrective Action Taken and the Results Achieved

Item 1d:

The subject drawings will continue to be released showing "clouds" around areas requiring fabrication/installation changes. These drawings will be reviewed by the joint Daniel-Wisner and Becker field hanger engineering task force. The task force will provide additional specific written work direction, as appropriate, in order to direct the crafts who perform the work. This direction is provided on the work assignment sheet which forms a part of the hanger traveler.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1d:

By providing adequate direction on the work assignment sheets, the craft will have the necessary information available for future modifications of hangers.

Date When Full Compliance Will be Achieved

Item 1d:

The method described above has been implemented.

Corrective Action Taken and the Results Achieved

Item 1e:

Hanger P44-3189-G16 was inspected as of August 29, 1979 and accepted by Q.C. Further steps are being taken to revise WB-C-114 to show how the hanger is turned over to Q.C. for inspection.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1e:

The problem appears to be a lack of clarification regarding the timing of turn-over of a hanger from construction to Q.C. The steps being taken to resolve this matter are:

- a. A training session is to be held which will specify that hangers are to be released to Q.C. for inspection within five days following completion of installation.
- b. An Interim Change to procedure WB-C-114 will be prepared to incorporate that time limit.

1252 037

Date When Full Compliance Will Be Achieved

Item 1e:

The first training session was held on September 26, 1979. The Interim Change to WB-C-134 is expected to be approved by October 5, 1979.

Corrective Action Taken and the Results Achieved

Item 1f:

Traveler packages have been reviewed to assure that those released for construction are complete. This review was initiated September 8, 1979. The packages are being initially reviewed by Wismer and Becker and Daniel. This review includes Q.A., Q.C., Engineering and Construction personnel. Individuals within the construction groups have been designated to continue this effort.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1f:

Traveler package procedure WB-E-109 was revised to clarify package contents and was formally approved the week of 9/17/79. A training class has been held and the procedure is released for construction. In addition, the Traveler package detail for QA-I hangers is being revised to clarify work.

Date When Full Compliance Will Be Achieved

Item 1f:

The ongoing review of packages will continue until work is complete. The revised Traveler package procedure will be fully implemented by October 1, 1979.

Corrective Action Taken and the Results Achieved

Item 1g:

The responsibility for verification of work performed, to Field Modification Requests (FMR's) has been delegated to the Daniel Discipline Managers by Edison. The contractors have been instructed to develop procedures to accomplish this FMR Verification and submit them to Daniel for approval. On September 12, 1979 L.K. Comstock's FMR procedure was approved for implementation.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item 1g:

Procedures will be developed by the necessary site contractors and implemented to assure all work completed per QA Level 1 FMR's is inspected and approved by a QC organization. Procedural conflicts resulting from changing the responsibility of FMR inspection from Edison Field Engineering to the various site QC organizations will be corrected.

1252 038

Date When Full Compliance Will be Achieved

Item lg:

Full compliance will be achieved in a continuing process as contractors' procedures are approved and implemented. All necessary procedures are expected to be completed by December 3, 1979.

Corrective Action Taken and the Results Achieved

Item lh:

All non-installed Q.A. Level I fabricated support assemblies have been segregated and placed on hold. A 100% Q.C. inspection will be conducted to verify configuration prior to release from hold.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item lh:

For non-delivered supports, a 100% source inspection will be conducted until confidence has been established in the various manufacturers/fabricators.

Date When Full Compliance Will be Achieved

Item lh:

The policies described above have been implemented.

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Corrective Action Taken and the Results Achieved

Items li and lj:

As discussed with your inspector subsequent to the inspection, Quality Assurance Level I strut assemblies presently designed with "drive fit" load pin holes will be re-designed based on the latest available loading information. The re-design effort will incorporate struts with spherical end bearings. These bearings will be equipped with close fitting load pins or cap screws. Special care will be taken both in design and installation/inspection to insure that threaded portions of load pins or cap screws will not be in the load path.

Corrective Action Taken to Avoid Further Non-Compliance

Items li and lj:

Implementation of the actions identified above will be sufficient to prevent similar type discrepancies in the future.

Date When Full Compliance Will be Achieved

Items li and lj:

The redesign effort will be a continuing activity with completion scheduled prior to fuel loading.

Corrective Action Taken and the Results Achieved

Item lk:

A review of the hanger sketch in question was made by Engineering. It was determined that the complete dimension description for the lug in question is provided in the Bill of Material that accompanies the sketch ( $\frac{1}{2}$ " x 4" x 3" pipe lug). The single 4-inch dimension for the lug shown on the sketch was provided only for the purpose of depicting the proper orientation of the lug on the pipe.

A review of item 103 lug retainer indicates that the lug retainer was properly chosen for the application; that is, its load rating and dimensional configuration are compatible with the subject special lug.

Corrective Action to be Taken to Avoid Further Non-Compliance

Item lk:

Additional corrective action is not required.

Date When Full Compliance Will be Achieved

Item lk:

Full compliance has been achieved.

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