

**Detroit  
Edison**

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June 22, 1981

EF2 - 53,862



Mr. L. L. Kintner  
Division of Project Management  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Kintner:

Reference: Enrico Fermi Atomic Power Plant, Unit 2  
NRC Docket No. 50-341

Subject: Procedures for Feedback of Operating  
Experience - NUREG-0737, Item I.C.5

The attachment is submitted as a revision of Detroit Edison's response to item I.C.5 in Appendix H to the FSAR. This responds to a position by the Licensee Qualification Branch LQB-5. We believe that the summary description provided should resolve the concerns regarding the timeliness of LER reviews. If considered acceptable we will amend the FSAR accordingly and will provide detailed procedures describing the feedback process three months prior to fuel load.

Sincerely,

A handwritten signature in cursive script, appearing to read 'W. F. Colbert'.

W. F. Colbert  
Technical Director  
Enrico Fermi 2

WFC/AEW:jl  
Attachment

cc: B. Little

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#### H.1.C.5.3 Detroit Edison Position

The Technical Engineer (Nuclear Section) has the responsibility to assure that all Enrico Fermi 2 License Event Reports (LER'S) are reviewed by the On Site Review Organization (ORSO). On procedural matters requiring urgent attention, he can convene an ORSO meeting on short notice to obtain a committee resolution on the plant operation, plant maintenance, and other plant work activities. LER's that are deemed significant by OSRO and lead to design changes, must be submitted to the LER coordinator for further analysis, and affected personnel as well as the Independent Review and Audit Group (IRAG) will be informed of the ORSO action.

The LER coordinator will review all plant LER's. The significant Enrico Fermi 2 LER's will be forwarded to the appropriate nuclear engineering staff for in-depth review, analysis, and recommendations for changes to improve plant operations. The review will be given priorities based on the urgency indicated by the Technical Engineer or OSRO. Before implementation of the recommended action by the LER coordinator to upgrade nuclear safety by resolution of the LER, a review by IRAG and a final approval by the Manager - Nuclear Operations must be obtained. If warranted, expeditious review by the IRAG will be accomplished by conducting special reviews for these significant LER's assigned an urgent priority by the Technical Engineer or OSRO. It will be the LER coordinators responsibility to ensure that all recommended actions are implemented in a prompt and timely manner.

With regard to LER's generated at other nuclear stations, it is Detroit Edison's intention to use the INPO/NSAC program "Significant Event Evaluation and Information Network" (SEE-IN) to identify the significant LER's. Once SEE-IN identifies a significant event, the event will be processed by the LER coordinator in the same manner as an Enrico Fermi 2 significant LER.

The function of the LER coordinator will be audited periodically to ensure effective implementation of the feedback program.

Detailed procedures relative to the processing of LER's will be furnished no later than 90 days before fuel loading. The emphasis of these procedures will be to provide a controlled and expeditious process that assures a thorough analysis and review of all significant LER's to be implemented, as well as, ensuring that personnel are fully informed and trained in the recommended actions that will improve plant safety and operations. The detailed procedures will be responsive to the NRC position as stated in paragraph H.1.C.5.2.