

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

July 29, 1981
EF2 - 54,192

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

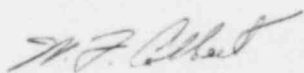
Dear Mr. Kintner:

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

Subject: Feedback of Operating Experience

The attachment is a summary of Detroit Edison's proposed procedures to respond to TMI Issue I.C.5. This response should resolve your concerns regarding this item. The FSAR will be amended accordingly.

Sincerely,



W. F. Colbert
Technical Director
Fermi 2 Project

WFC:jl
Attachment

cc: Mr. B. Little

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Summary of Detroit Edison Position
on TMI Issue I.C.5
"Feedback of Operating Experience"

The Detroit Edison Company will review and assess both internal and external operating experience to assure that information pertinent to plant safety is continually supplied to operators and other personnel as appropriate and is utilized to effect design and procedural changes to correct generic or specific deficiencies and to enhance plant safety when warranted.

The review of externally generated operating experience will be carried out primarily by individuals within the Nuclear Safety and Plant Engineering Group. This experience will include but not be limited to General Electric NSSS reports, NSAC reports, LERs forwarded from the INPO program "Significant Event Evaluation and Information Network" (SEE-IN), and NRC Bulletins, Circulars and Notices. Information which is considered to be of a nature such that urgent disposition necessary will be forwarded to the appropriate plant production staff immediately.

Operating experience which is considered to warrant further evaluation is assigned to individuals within the NSPE group or plant staff as appropriate for evaluation and recommendations. The conclusions and recommendations are returned to the NSPE group for approval and then assigned for implementation to the Plant Modification Group for design changes and/or to the appropriate plant staff and training organizations for procedural modifications. Procedural changes will be reviewed and approved by OSRO. Operators and STAs are notified of implemented changes as well as the Nuclear Training Department.

The review of internally generated operating experience (primarily LERs) begins with the Technical Engineer who prepares plant LERs. The Technical Engineer submits the LER to the On-Site Review Organization (OSRO) which is made up of the section leaders of the Nuclear Production staff and the plant superintendent. Shift supervisors and STAs will be notified of all plant LERs. The OSRO will evaluate the LER to determine whether procedural and/or design changes are called for or whether further analysis is necessary. For straightforward procedural matters, the OSRO will recommend and approve the changes and assign them to plant staff for implementation including training program modifications. For LERs which relate to plant design or require in-depth analysis, OSRO will transfer the information to the Nuclear Safety and Plant

engineering group along with their recommendation, if any. This group will determine the appropriate response and assign the change for implementation to the Plant Modification group or plant staff as appropriate.

The Nuclear Safety and Plant Engineering group will receive all plant LERs and internal operating experience as a matter of course and therefore may choose to take action on an LER even if OSRO elected not to refer it to them.

Any change which constitutes an unreviewed safety question will be reviewed and approved by the Independent Review and Audit Group (IRAG) prior to implementation.