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EF2-64308

Mr. R.L. Spessard, Director
Division of Engineering
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Noncompliance at Enrico Fermi Unit 2 - IE Report 50-341/83-12

Dear Mr. Spessard:

This letter responds to the item of noncompliance described in your IE Report No. 50-341/83-12. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Messrs. C. Ramsey, F. Maura and J. Ulie on March 18, 21 and May 10-13, 1983.

The item of noncompliance 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 enclosed response is arranged to correspond to the sequence of items cited in the body of your report. The number for the item of noncompliance and the applicable criterion are referenced.

We trust this letter satisfactorily answers the concern raised in your report. If you have questions, please contact Mr. G.M. Trahey, Assistant Director - Project Quality Assurance.

Very truly yours,

DAW/WEM/pn

cc: Mr. Richard DeYoung, Director
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Bruce Little, Senior Resident Inspector
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THE DETROIT EDISON COMPANY

PROJECT QUALITY ASSURANCE

ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/83-12

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: March 18, 21 and May 10-13, 1983

Statement of Noncompliance, 83-12-09

10CFR50, Appendix A, General Design Criterion No. 1 requires establishment and implementation of a Quality Assurance Program to provide adequate assurance that all fire protection structures, systems and components will satisfactorily perform their safety function.

Your response to Sections C, C.1 and D.1.(d) of Appendix A to NRC Branch Technical Position APCS 9.5.1. as stated in Amendment No. 12 to the Fermi 2 FSAR, dated June 12, 1978, committed Detroit Edison Company to apply portions of the plant operations Quality Assurance Program to Fire Protection in safety-related areas to assure that the requirements on design control and procurement document control are maintained and that plant structural components for fire protection are listed by a nationally recognized testing laboratory, such as Factory Mutual or Underwriters Laboratories, Inc.

Paragraph D(j) of Amendment 24 to the Fermi 2 FSAR, dated June 1979, states in part, "Door openings are protected with equivalently rated doors, frames and hardware that have been tested and approved by a nationally recognized testing laboratory".

Detroit Edison Company construction Specification Nos. B6-NS-01A and B6-NS-02A, Revision A, dated June 25, 1980, Part 5, requires U.L. Labels (permanently affixed) attesting to the fire resistive capability of fire doors delivered to the Enrico Fermi 2 jobsite.

Contrary to the above, Detroit Edison Company Purchase Orders 1A-53112 and 1A-53113, dated January 13, 1981, did not specify U.L. Labels attesting to the fire resistance capability of doors numbered R3-13, T3-6, R3-20, RM2-1, R2-11 and R2-16 which are installed in safety related areas of the plant. Adequate documentation was not available to attest to the fire resistive capability of these doors and no U.L. Labels attesting to their fire rating was affixed to them. Four doors, RM2-2, RM2-3, RM2-4 and R2-20 had 1½ hour U.L. Labels affixed to them but did not have the required three hour fire resistive rating as stated in the Fermi 2 FSAR.

Corrective Action Taken and Results Achieved

As an explanation, Detroit Edison offers the following:

When the bids to supply the security doors to Edison were originally received, Stone and Webster (then the A/E for security systems) evaluated the bids.

Chicago Bullet/Proof Equipment Company's (CBP) bid took exception to the requirements that the doors bear U.L. (Underwriter's Laboratories, Inc.) fire labels.

Stone and Webster's evaluation of the bids noted CBP exception to providing U.L. labels and found that acceptable because they were of the

Corrective Action Taken and Results Achieved (cont'd)

opinion the doors were to be constructed to fire specifications.

Edison personnel involved with security, noting that the actual construction of the doors would be adequate for fire, did not recognize the consequences in not receiving a label and therefore, agreed with Stone and Webster's recommendation.

In order to provide effective corrective action, Edison has contracted with Underwriter's Laboratories (U.L.) to investigate, evaluate and fire test where necessary, to assure the doors in question will satisfactorily perform their safety function, i.e., fire resistive capabilities are satisfactory. The investigation, evaluation and fire test results will be made available in a report released by U.L. to authorized NRC and Edison personnel.

The fire hazard analysis in section 9B.4 of the FSAR and drawings 6A721-2400 through 6A721-2424 inclusive described the rating of barriers at Enrico Fermi 2 and are the documents utilized for fire analysis. Due to an editorial oversight, Paragraph f(2), f(3) and f(5) are incorrect. We will be amending these FSAR paragraphs.

Utilizing these fire protection drawings, doors RM2-2, RM2-3, RM2-4 and R2-20 are shown as 1½ hour rated doors. It is Edison's opinion the correct rating was assigned to these doors. NOTE: Door RM2-1 is not a security door and was purchased through a different purchase order.

Corrective Action to be Taken to Avoid Further Noncompliance

The corrective action that Engineering will take to alleviate future problems and conflicts dealing with fire rated door assemblies will be to revise G.E.I. (Generation Engineering Information) technical form No. M-102, Revision 2, entitled "Fire Protection for Buildings and Equipment for Fossil and Nuclear Plants" and add section on fire rated door and frame assembly requirements and ratings.

The purpose of the above mentioned G.E.I. technical form is to present information and set policy to be used by all engineers and designers in the Generation Engineering Department.

The Date When Full Compliance will be Achieved

The investigation report from U.L., procedure revision and FSAR change should be complete by approximately November 30, 1983.