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April 23, 1990
NRC-90-0052

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

- Reference: 1) Feral 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Inspection Report 86-011,
dated June 13, 1986
- 3) Detroit Edison letter VP-860087,
dated July 11, 1986
- 4) NRC Inspection Report 88-031,
dated January 24, 1989

Subject: NRC Violation 86-011-05 on Nuclear Quality Assurance
Program

The purpose of this letter is to discuss changes made to commitments that address the Nuclear Quality Assurance Program in Violation 86-011-05.

Violation 86-011-05 in Reference 2 documented a failure to take timely corrective action on 25 audit findings that had been open 6 to 18 months. The response to that identified violation was provided in Reference 3. Two of the committed corrective actions are addressed here. The first action was to issue a monthly status report of all open corrective action documents issued by Nuclear Quality Assurance (NQA). This report highlighted findings open more than 6 months. The second action was to require audited organizations to obtain Director NQA concurrence for audit findings that require resolution in excess of 6 months.

These items were closed in Inspection Report 88-031 after a review of Detroit Edison's corrective actions. This report states that a "Delinquent Findings Report", containing QA audit findings not resolved within 90 days, is issued weekly to management.

Recently, we have consolidated our corrective action process for QA findings. NQA still monitors/tracks the status of corrective action document completion for QA audit findings. FMD-AS1 and FIP-AS1-01 are the current program requirement document and the implementing document, respectively, that superseded QAPR-18 and NQAP-1801. FMD-AS1 and FIP-AS1-01 require NQA to maintain a status report of open items of NQA audit/surveillance initiated Deviation Event Reports (DERs) and Quality Findings and Corrective Action Requests. The Delinquent Finding Report is the document that provides a status report of NQA findings greater than six months and those coming due within one month. It is distributed weekly to middle and upper

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management. At the time of the Inspection Report 88-031, this weekly status report was issued showing QA findings not resolved in 90 days. Based on experience with this time period, it was found that extending the period to 6 months would provide for a more reasonable resolution/response time.

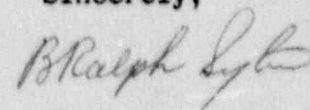
Management is promptly informed of audit findings at the exit meeting held on the last day of the audit. Within 30 days of completion of the audit, a written copy of the audit is sent to the director of the audited organization. All NQA audit findings are assigned DER numbers and then tracked through the DER program in Plant Safety. This system has the capability of selecting out NQA audit DERs for review. NQA tracks and maintains a status of all QA findings and reviews the corrective action responses for all QA initiated DERs. The Plant Manager establishes severity level and due dates on DERs. A significant or high impact finding receives the appropriate due date and prompt management attention through our DER program. This program requires the responsible Director/Superintendent approval for corrective actions scheduled in excess of 6 months or for any extensions beyond the original due date. Extensions then receive concurrent approval by the Director Plant Safety, who reports to the General Director NQA/Plant Safety. With the formal extension process, it was no longer deemed necessary for the Director NQA/Plant Safety to review and approve extensions. However, the General Director NQA/Plant Safety is kept informed of the delinquent and upcoming due QA audit findings through the weekly Delinquent Findings Report.

These changes do not reduce the level of management attention to QA findings. In fact, the level of attention is higher in that the Plant Manager or his delegate reviews and assigns initial responsibility and due dates for all DERs. The DER program provides a centralized program for resolution of QA findings with management approval of appropriate corrective actions and schedule extensions.

A telephone conference was held on April 3, 1990, with F. Jablonski, NRC Section Chief, T. Riley, Supervisor Compliance and Special Projects, and Vince Manta, NQA to discuss the proposed changes in this commitment. Our procedures have subsequently been changed.

If there are any questions concerning this matter, please contact Barbara Siemasz, Compliance Engineer, at (313) 586-1683.

Sincerely,



cc: A. B. Davis
R. W. DeFayette
W. G. Rogers
J. F. Stang
Region III