

Detroit
Edison

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Nuclear
Generation

May 29, 1990
NRC-90-0086

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

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NFP-43

2) NRC Inspection Report No. 50-341/90005
dated April 27, 1990

Subject: Response to Notice of Violation 90005-06

Attached is Detroit Edison's response to Notice of Violation 90005-06 for the mispositioning of the Division 1 Non-Interruptable Air Supply (NIAS) Aftercooler Drain Valve, P50-F206A, in the closed position. Temporary Modification 89-019, which removed the Division 1 NIAS compressor Aftercooler Condensate Drain Trap, repositioned the valve to open.

A change was made to System Operating Procedure 23.129, "Station And Control Air System", when the Temporary Modification was installed to indicate the new correct position of the valve, i.e, normally open. The valve was positioned open following the installation of the Temporary Modification. This was done to allow draining of the Aftercooler Cyclone Separator, which normally drained via the removed Condensate Drain Trap. However, on March 21, the valve was determined to be in the wrong position following a walkdown of the Temporary Modification by our NRC Resident Inspector. Operations Personnel then restored the valve to its correct position.

On April 28, 1990, during the performance of procedure 27.129.03, "NIAS Valve Line-Up Verification", by Operations Personnel, the Division 2 NIAS Aftercooler Drain Valve, P50-F206B, was found to be mispositioned to the open position. This is a normally closed valve since the normal drainage path for the system is to the Condensate Drain Trap (i.e, the Temporary Modification installed on Division 1 is not installed on Division 2). Operations Personnel immediately restored the valve to its correct position. Deviation Event Report 90-0288 was written to evaluate the root cause of this condition. A Nuclear Security investigation was initiated following the April 28th incident and to date indicates that tampering has not been a cause of these occurrences.

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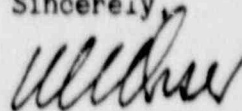
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The attached response to this violation discusses: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved, as required.

If you have any questions please call Mr. Joseph Pendergast, Compliance Engineer, at (313) 586-1682.

Sincerely,



W. S. Orser
Senior Vice President

Enclosure

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

RESPONSE TO NOTICE OF VIOLATION 90005-06

Statement of Violation:

"10 CFR 50, Appendix B, Criterion V, "Procedures, Instructions, and Drawings," states in part "Activities affecting quality shall be prescribed by documented...procedures...and shall be accomplished in accordance with these...procedures...."

Administrative procedure NPP-OP1-08, "Control of Equipment," section 5.1.2 requires valves out of normal position be recorded on an abnormal lineup sheet.

Contrary to the above on March 20, 1990 drain valve P50F206A was not in its normally open position and it was not recorded on an abnormal lineup sheet."

The Corrective Actions That Have Been Taken and The Results Achieved:

Upon discovery and following discussions with the Control Room, P50-F206A was correctly positioned to allow draining of the Aftercooler Cyclone Separator. Deviation Event Report 90-0222 was written to evaluate the root cause of this condition.

A Night Order was issued to Operations Personnel. It stressed that manipulations performed during routine rounds and inspections shall not be made without notification of the Control Room Nuclear Supervising Operator. An Abnormal Lineup Sheet (ALS) shall be filled out as soon as possible afterwards if the manipulations result in an abnormal lineup. This Night Order reinforced the philosophy of maintaining configuration control over all plant equipment and thus an ALS shall be prepared for all manipulations not covered by an approved System Operating Procedure.

Following the April 28th incident Nuclear Security began an investigation. The investigation is ongoing. Based on the results to date it is believed that plant personnel had not tampered with these valves.

The Corrective Actions That Will Be Taken To Avoid Further Violations:

The Operations Routine Rounds Sheet has been revised. Operations Personnel will be checking the position of valves P50-F206A and B daily as part of their normal rounds. This will continue until Temporary Modification 89-019 is removed. This will ensure the proper configuration of these valves is maintained.

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The Security investigation is expected to be completed by June 15, 1990, and the results will be available for review by the NRC Resident Inspectors. Any corrective actions required from this investigation will be taken in accordance with company policy.

The Date When Full Compliance Will Be Achieved:

Detroit Edison is currently in full compliance with the administrative procedure, NPP-OP1-08, for control of plant equipment/configuration.