

Detroit
Edison

William S. Orser
Executive Vice President
Nuclear Generation

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5201



Nuclear
Operations

March 9, 1993
NRC-93-0024

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

2) NRC Inspection Report No. 50-341/92018,
dated January 8, 1993

Subject: Reply to NRC Emergency Operating Procedure Team
Inspection

This letter provides the Detroit Edison's response to the Open Items contained within NRC inspection report 50-341/92018. Detroit Edison appreciates the opportunity to respond to the inspection of the Fermi 2 Emergency Operating Procedures. The enclosed attachment provides a detailed response to the open items identified by the NRC team. If you have any questions concerning this response, please contact Mr. Joseph Pendergast, Compliance Engineer at (313) 586-1682.

Sincerely,

Enclosure

cc: T. G. Colburn
A. B. Davis
W. J. Kropp
M. P. Phillips
Region III

150029

9303150205 930309
PDR ADOCK 05000341
G PDR

JE35

Introduction

The purpose of this letter is to respond to the inspection of the Fermi 2 Emergency Operating Procedures (EOPs) by a Region III NRC Team on November 2 through 23, 1992. Fermi 2 personnel found the inspection of our EOPs and the inspection of our process for controlling and maintaining the EOPs to be extensive. Detroit Edison understands the open items and intends to address each one of the open items listed in the Inspection Report.

We agree with the NRC that the EOPs and support procedures are technically correct and useable. The actions specified by these procedures can be accomplished by operations personnel using the existing equipment, controls and instrumentation available. The EOPs are adequate for mitigating the accident scenarios described in the BWR Owners' Group EOP Guidelines. The usability of the EOP flowcharts has been demonstrated numerous times during license operator exams. However, we realize that the EOP administrative controls can be enhanced so that the quality of the EOP's can be improved, controlled and maintained over time.

Detroit Edison agrees that the EOP Writers Guide and the Verification and Validation (V&V) process for flowchart implementation can be improved. We also agree that the open items discussed in the inspection report were primarily due to the lack of human factors support during the development and review of the EOP flowcharts and Writers Guide. Therefore, Detroit Edison established the EOP Overview Committee, consisting of management personnel, who will provide the oversight and direction to ensure that the open items are completely addressed.

Additionally, while no technical deficiencies were identified by the NRC Team with the EOP flowcharts, the consistent application of human factor principles need to be applied to the EOP flowcharts. These human factor principles are intended to establish and maintain a high level of operator performance during abnormal or high stress conditions.

An Action Plan with completion date milestones was established to resolve the EOP open items. The open items 92-018-01, 92-018-02 and 92-018-03 identified by the NRC Team will be completely remedied by startup from the Fourth Refuel Outage.

Open Item 92-018-01a

"Several minor procedure deficiencies were identified (e.g., omission of support procedure references in the flowcharts) during the desktop reviews of the EOP flowcharts and support procedures."

Detroit Edison's Action to Resolve Open Item

The procedure discrepancies identified by the NRC Team will be addressed as part of the EOP procedure enhancement effort. Revision of the EOPs is currently in progress.

Open Item 92-018-01b

"No significant procedural deficiencies were noted during the walkthroughs of the EOP flowcharts and support procedures; the operators could generally accomplish the EOP tasks as written, and the required equipment was generally available and pre-staged. However, several weaknesses were identified (e.g., labeling) which have the potential to cause operator delays and confusion."

Detroit Edison's Action to Resolve Open Item

The labeling and possible operator delay and confusion issues identified by the NRC Team will be addressed as part of the EOP enhancements. The enhancement of EOP labeling is currently in progress. These issues will be resolved using the current labeling policy by the startup after the Fourth Refuel Outage.

Open Item 92-018-02

"The V&V program was generally adequate, however, sufficient guidance was not provided to ensure successful completion of the V&V for the flowchart EOPs. Significant weaknesses were identified in the implementation of the V&V program, particularly for that conducted prior to EOP flowchart issuance. In this regard, the V&V effort was both incomplete and ineffective, especially from a human factors standpoint."

Detroit Edison's Action to Resolve Open Item

The V&V process discrepancies identified by the NRC Team will be addressed as part of the general EOP procedure enhancement. The V&V effort for the EOP enhancement will conform to industry standards. Furthermore, an independent human factors reviewer will participate in the V&V effort.

Open Item 92-018-03

"The EOP flowcharts and Writers Guide were developed and verified without appropriate consideration of human performance principles. As a result, the Writers Guide did not effectively control the presentation of information in the EOP flowcharts, and the flowcharts were poorly organized, formatted, and written. The weaknesses identified in the EOPs have the potential for affecting operator performance in high stress situations."

Detroit Edison's Action to Resolve Open Item

The EOP Writers Guide and the Administrative Procedure, "Emergency Operating Procedure Development Process" will be rewritten as part of general improvements and will address the open item identified by the NRC Team. An independent human factors reviewer will be involved with the development of the Writers Guide, Administrative Procedure and the EOP flowcharts.

Enclosure to
NRC-93-0024
March 9, 1993
Page 3

Conclusion

Detroit Edison formed an EOP Overview Committee and the actions to resolve open items identified by the NRC Team are presently being addressed. Milestones have been established for enhancing the Fermi 2 administrative controls for EOP development and implementation. The milestones are: revise and enhance the Writers Guide by the end of July 1993, revise and approve the Administrative procedure by the end of September 1993, revise the EOP flowcharts and have V&V of the flowcharts complete by the end of February 1994, and implement the revised flowcharts and support procedures by startup from the Fourth Refuel Outage.