Detroit Edison

Donald A. Wells
Manager-Quality Assurance
(313) 237-9657

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

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Mr. James G. Keppler,
Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Detroit Edison Comments on the Systematic
Assessment of Licensee Performance (SALP) Report

The SALP report meeting held at our headquarters on March 16, 1982, was appreciated by Detroit Edison attendees. The format change and use of performance categories in the functional area evaluations are, in our opinion, definite improvements over the original SALP system. Although the SALP Board review of our (licensee) performance at the Fermi site found most activities to be acceptable, four areas of concern, to the Board, were identified and recommendations made for additional licensee attention.

Since this assessment covers only the period from July 1, 1980, to September 1, 1981, we feel that we should comment on the improvement activities we have implemented. Enclosure 1 to the SALP report identifies the four areas of concern. For ease in relating our comments, I have listed your (NRC) concern and then our commentary.

NRC Concern: Functional Area - Radiation Protection, Radioactive Waste Management and Transportation

DECo Comment: The expressed concerns of the SALP Board were in staffing, training, and updating of the FSAR. In July, 1981, an intensive effort to assure staffing of not only this functional area but all of the Nuclear Operations Organization was implemented by assigning a full-time corporate employment group located near the site to expedite recruitment and placement of qualified personnel. In this functional area, the Health Physics Supervisor of Dosimetry, two degreed Health Physics Specialists, eleven Health Physics Technicians, and two Chemistry Technicians have been employed. All of these technicians, per our requirement, are ANSI qualified.

In addition, a PhD Health Physicist has been hired to fill the position of Corporate Health Physicist in the Nuclear Engineering Department. He has recently completed a six-month assignment at Dresden to acquire experience in a commercial BWR facility. To provide additional start-up support, six technician positions and a clerical position have been contracted.

Training programs have been under development since September, 1981, by our Nuclear Training Department and their contractors. The General Employe Training program is nearing completion with Radiation Worker and Health Physics Training under way. The functional area supervision has developed an interim, internal training program currently in use.

Change requests for the several areas of the FSAR which need revision to reflect functional area organization changes and plant design changes have been submitted, and Chapter 12 is undergoing full review by the Health Physics Group to determine what changes are needed.

NRC Concern: Functional Area - Maintenance

DECo Comment: The NRC is concerned about the apparent weaknesses in the maintenance program for systems under licensee control. Since 1974, for systems and equipment under construction control, an Equipment Maintenance Record Card program (EMRC) has been used, on a selective basis, to ensure the integrity of critical components from receipt by the constructor to turnover to Detroit Edison Startup for initial testing. This is an approved, proceduralized program. Also, the Nuclear Production Organization was developing the permanent plant preventative maintenance program and in July, 1980, had forty-one approved maintenance procedures in place and a QA audit procedure.

However, for the interim period between initial testing and pre-operational/acceptance testing, responsibility for maintenance and a maintenance program were not as clearly defined. With the reorganization of the system completion and testing function in the Fall of 1981 and the assignment of high-level Detroit Edison management personnel to this critical area, corrective actions were instituted.

Currently, the EMRC program is still in use for equipment and/or systems under construction. When equipment/system is turned over to Edison, a preventative maintenance system under Edison control and with procedures in the draft and review stage will be in effect. This system, Extended Shutdown Preventative Maintenance Program (ESPM) uses the EMRC as a basis and covers all activities deemed necessary by the Nuclear Production Department. Also, at this time, the equipment being turned over is inspected and, where necessary, restored to "as-new" condition, according to a proceduralized "Refurbishment Program". Once the system/equipment has begun the preoperational/acceptance test phase, the permanent plant operational Preventative Maintenance Program begins. This maintenance program presently has seventy-five approved procedures, sixty-four approved maintenance instructions, QA audit, surveillance and inspection procedures and a group of procedure writers working on many more procedures.

We feel that these administrative changes have strengthened not only the maintenance program but also the administrative control in the system completion, turnover and testing functions.

NRC Concern: Functional Area - Preparations for Preoperational Testing

DECo Comment: The period of time which the assessment covers, July, 1980, through September, 1981, was primarily construction oriented with approximately 58% of the subsystems turned over to Detroit Edison by the end of the period.

During this period, turnover and completion of equipment/systems was a function of our Construction Manager who also supplied craft support for finishing construction and Checkout and Initial Operation (CAIO) testing. Repair and Rework Requests (RRR), punchlist items and additional work were collected on several lists without a specific plan to coordinate and complete items needed to support the testing program.

As stated in the SALP report, subsequent to the evaluation period, many organizational changes have been made dedicating resources to identify items which are restraining testing, schedule and to work off punchlist items. On-site support is provided from Startup Engineering Assistance, System Completion Organization, Refurbishment and Project Quality Assurance, with an objective of getting systems tested satisfactorily.

The System Completion Organization (SCO) is responsible for obtaining and applying the resources as required by Startup. An effective punchlist card system has been developed which now contains required information to allow for effective work off of outstanding items, along with a tracking system to keep current with status outstanding items. Punchlist items on all systems are collected and listed together by systems with the intention of dispositioning them in priority in accordance with their need, material status and impact on related systems.

Since November 1, 1981, a major reorder of emphasis has taken place with the project objective of completing all systems both previously and currently being turned over in support of CAIO testing. CAIO testing includes mechanical and electrical testing of components, chemical cleaning and flushing of systems in preparation for pre-operational or acceptance testing of systems to support fuel load. The SCO was formed and staffed to manage this support effort.

Procedures have been established or revised to define the activities and responsibilities of System Completion and Startup as they are to function. Joint training sessions have been conducted including interfacing organizations to assure understanding and compliance with the new procedures.

Since December, 1981, the Project Schedule Reviews are system oriented to identify restraints and establish action to clear the restraints.

In conclusion, the project emphasis, supported by organizational and personnel changes, is dedicated to completion of the project with established quality in a coordinated effort to allow testing, inspection and turnover of the plant to support the fuel load schedule.

NRC Concern: Functional Area - Licensee Tracking of Licensing Commitments

DECo Comment: During 1981, the Company conducted an additional review of documents it had submitted to the NRC in connection with the safety and environmental reviews conducted by the Agency with respect to Fermi 2. The purpose of the review was to provide the Company further assurance that it had documented its commitments to the NRC. Commitments identified by this review were entered in a computerized listing along with a date to achieve compliance, a responsible person and group assignment along with certain other information to facilitate searches and sorts of the data base in various ways. A continuing effort is under way to identify one or more documents which establish that the commitment has been satisfied or will be satisfied. In the latter case, for a hardware change or addition, a design change document, purchase requisition, or similar document is considered evidence that the commitment has been entered into a system designed to ensure its completion. For administrative and procedural commitments, the document which implements the commitment is identified such as a plant procedure, Startup procedure, Project QA manual, Plant Order, etc.

Two specific exceptions to the above are that NUREG-0737 items and items which the NRR Division has requested the IE Division to verify prior to issuance of Fermi's Operating License will be tracked through final implementation.

We believe this tracking system will provide a very high degree of confidence that licensing commitments are fulfilled.

Complete details of these changes in the form of procedures, organization charts, resumes, etc., are available to you and to the inspectors at any time.

Very truly yours,

DAWells

DAW:mb
cc: Mr. J. A. Hind, Director
Division of Emergency Preparedness
and Operational Support
Chairman, Region III SALP Board
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Mr. Bruce Little, Resident Inspector
U. S. Nuclear Regulatory Commission
Resident Inspectors Office
6450 North Dixie Highway
Newport, MI 48166

I. INTRODUCTION

The NRC has established a program for Systematic Assessment of Licensee Performance (SALP). The SALP is an integrated NRC Staff effort to collect available observations and data on a periodic basis and evaluate licensee performance based upon these observations. SALP is supplemental to normal regulatory processes used to ensure compliance to the rules and regulations. SALP is intended from a historical point to be sufficiently diagnostic to provide a rational basis: (1) for allocating future NRC regulatory resources, and (2) for providing meaningful guidance to licensee management to promote quality and safety of plant construction and operation.

A NRC SALP Board composed of managers and inspectors who are knowledgeable of the licensee activities, met on February 16, 1982 to review the collection of performance observations and data to assess the licensee performance in selected functional areas.

This SALP report is the Board's assessment of the licensee safety performance at Enrico Fermi-2, for the period July 1, 1980 to September 30, 1981.

The results of the SALP Board assessments in the selected functional areas were presented to the licensee at a meeting held March 16, 1982.

II. CRITERIA

The licensee performance is assessed in selected functional areas depending whether the facility is in a construction, preoperational or operating phase. Each functional area normally represents areas significant to nuclear safety and the environment, and are normal programmatic areas. Some functional areas may not be assessed because of little or no licensee activities or lack of meaningful observations. Special areas may be added to highlight significant observations.

One or more of the following evaluation criteria were used to assess each functional area.

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from a safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

However, the SALP Board is not limited to these criteria and others may have been used where appropriate.

Based upon the SALP Board assessment each functional area evaluated is classified into one of three performance categories. The definition of these performance categories is:

Category 1. Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2. NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3. Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

III. SUMMARY OF RESULTS

Functional Area Assessment	Category 1	Category 2	Category 3
1. Soils and Foundations		Not Rated	
2. Containment and other Safety-Related Structures		X	
3. Piping Systems and Supports		X	
4. Safety-Related Components		Not Rated	
5. Support Systems		Not Rated	
6. Electrical Power Supply and Distribution		Not Rated	
7. Instrumentation and Control Systems		X	
8. Licensing Activities		X	
9. Radiation Protection, Radioactive Waste Management and Transportation		X	
10. Design Control		Not Rated	
11. Quality Assurance		X	
12. Administrative Controls			X
13. Preparations for Preoperational Testing		Not Rated	

IV. PERFORMANCE ANALYSES

1. Soils and Foundation

The licensee is not rated in this area. No inspections were performed in this area.

2. Containment and Other Safety Related Structures

a. Analysis

No significant events or ongoing activities in this area took place during this evaluation period. One routine inspection was performed and no items of noncompliance were identified.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendation

None

3. Piping Systems and Supports

a. Analysis

Two investigations and six inspections were performed in this area. The investigations resulted from allegations received at two separate times relating to quality concerns. During these investigations, two items of noncompliance were identified as follows:

(1) Failure to provide installation procedure and acceptance criteria for instrument tubing.

(2) Failure to adequately identify insert material by heat number.

The six inspections were performed by the regional inspection staff and included an annual indepth QA inspection related to mechanical and piping systems. During these inspections, three items of noncompliance were identified as follows:

(1) Use of interoffice memoranda in lieu of approved procedures for safety related work.

(2) Use of incorrect penetrameters for radiographing welds.

(3) Failure to maintain the Project Procedures Manual up-to-date with current practice.

Weaknesses were identified in the trending of nonconformances being performed by Daniel International Corporation. This activity is now being performed by the licensee and appears adequate.

The severity of each of the above five items of noncompliance is considered minor. The licensee was responsive and corrective action was prompt.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

Although the nature and severity of the noncompliances are minor they may be indicative of procedural weaknesses. The board recommends that the licensee assess this possibility.

4. Safety Related Components

The licensee is not rated in this area. No inspections were performed in this area.

5. Support Systems

The licensee is not rated in this area. No inspections were performed in this area.

6. Electrical Power Supply and Distribution

The licensee is not rated in this area. Only one inspection was performed in this area which was of limited scope (switchgear bus 65F and associated current transformer). No items of noncompliance were identified.

Based on the extensive activity by the licensee in this area, the NRC inspection effort should be increased.

7. Instrumentation and Control Systems

a. Analysis

Two inspections were performed in this functional area. Specific areas inspected included in-process cable installation activities, licensee audit of electrical subcontractors, installation of instruments and related tubing, and instrument cable design and separation criteria. During these

inspections two items of noncompliance were identified as follows:

(1) Permitting cable installation activities to continue before correcting a known deficiency.

(2) Failure to carry out a comprehensive audit of the inplant construction activities of the electrical contractor.

The noncompliance relating to the cable pulling activities is considered to be significant. The licensee's response to this matter was timely and included a stop work order, cable tests and revised procedures. While the licensee's response appeared to be adequate, closeout of this item is pending NRC review.

b. Conclusions

The licensee is rated Category 2 in this area.

c. Board Recommendations

Based on the level of licensee activity relating to cable terminations, instrumentation and control system calibration, and testing, the board recommends that the normal inspection program be implemented.

8. Licensing Activities

a. Analysis

The quality and timeliness of licensee responses to NRR requests for information to prepare (Staff's) safety evaluation reports varied with the subject matter and the time remaining relative to the target date for the Safety Evaluation Report (SER) issuance. The quality of FSAR amendments and generic letter responses was above average as was the licensee's response to TMI requirements and reports on seismic reassessment. Early in the appraisal period, the licensee's reponses to reactor systems questions were slow and narrowly addressed written questions. This resulted in considerable NRC staff effort in conference calls and meetings to discuss responses and request additional responses. As the review progressed licensee's performance greatly improved, and responses to NRC issues were more timely and broadly addressed.

The licensee has a large competent staff and was usually well prepared for meetings providing appropriate personnel to respond to questions and present material. The management has engineering and nuclear background and is willing to support the licensing effort with adequate funds.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

None

9. Radiation Protection, Radioactive Waste Management, and Transportation

a. Analysis

Two (preoperational radiation protection) inspections were performed during the evaluation period by the regional inspection staff. No items of noncompliance were identified; however, lack of staffing of the Radiation/Chemistry Group and lack of development of the radiation protection training program were identified as significant concerns. Although significant effort was expended by the licensee following the first of these two inspections and resulted in progress on both of these concerns, much remains to be accomplished to meet the SER commitments regarding staffing and training before fuel load. Also, the licensee needs to update the FSAR to reflect significant changes (current and planned) in chemistry, radiation protection, and radwaste facilities.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

The board recommends that the licensee place additional emphasis on the staffing and training of the Radiation/Chemistry Group and the updating of the FSAR.

10. Design Control

The licensee is not rated in this area. During the SALP-1 meeting with the licensee the NRC described specific weaknesses in the licensee design control activities including an unresolved item relating to design documents which had numerous unincorporated design changes listed. The licensee discussed action taken and planned to strengthen design control. A subsequent NRC inspection identified that inadequate corrective action had been taken to assure that accurate and current documents were being used. The above unresolved item was later upgraded to an item of noncompliance. While the licensee's response to the item of noncompliance appears to be adequate, closeout of this item is pending NRC review.

11. Quality Assurance

a. Analysis

A programmatic inspection of the licensee's overall quality assurance program was not performed; however, the resident inspectors reviewed quality assurance practices and performance to determine if adequate independence was maintained and work was accomplished using approved procedures. Although no significant strengths or weaknesses were identified, these reviews did indicate the existence of deficiencies within specific QA areas. These deficiencies are:

Lack of program and failure to adhere to procedures relating to the control and calibration of torque wrenches.

Failure to provide QA implementing procedures for the checkout and initial operation testing prior to the commencement of these activities.

Lack of an effective QA surveillance program to identify and correct deficient maintenance of safety systems and housekeeping practices.

In the latter part of the evaluation period, increased attention and support in the area of quality assurance became apparent. This was evidenced by a more definitive assignment of responsibilities, additional personnel, and the development of implementing procedures.

One item of noncompliance was identified concerning failure to provide written procedures for the storage and preservation of QA records. The licensee's response was timely and appropriate.

b. Conclusion

The licensee is rated Categrory 2 in this area.

c. Board Recommendations

None

12. Administrative Controls

a. Analysis

Reviews conducted by the resident inspectors have indicated weaknesses in the control of activities such as preventive maintenance and tracking of licensing commitments.

The licensee has implemented a maintenance program for systems and components under construction control. This is considered a "reduced maintenance program" by the licensee, with a complete preventive maintenance program to be established prior to system operation. The inspectors found that only selective maintenance was being performed on systems and components which had been turned over to the licensee's startup group. For those systems turned over, except for instrumentation systems, the licensee had neither a maintenance program nor approved maintenance implementing procedures, and the quality assurance procedures relating to these activities had not been developed. Examples of deficiencies in the preventive maintenance of installed systems and components include the control rod drive cooling water pump (frozen-rust), Reactor Building closed cooling water heat exchanger (failed tubes), and contamination (dirt) in the main generator turbine oil system. In some instances, the correction of these deficiencies has taken months.

A review of the licensee's tracking of NRC issues and commitments indicated deficiencies requiring licensee attention. The licensee acknowledged the need to establish a closed loop tracking system that assures identified commitments are closed and verified. Although the licensee has devoted considerable effort in identification and the computer listing of these commitments, the licensee's administrative controls do not provide for verification and closeout.

b. Conclusion

The licensee is rated Category 3 in this area. While no items of noncompliance have been identified, the above examples are indicative of underlying weaknesses in administrative controls. The apparent weaknesses in providing adequate preplanning and preparation for activities indicates that additional attention is required.

c. Board Recommendations

The board recommends that the licensee place additional emphasis on preplanning, specifically in the development and implementation of an effective preventive maintenance program and a closed loop tracking system for licensing items.

13. Preparations for Preoperational Testing

a. Analysis

A programmatic inspection of this area was not performed by NRC inspectors, however, the resident inspectors reviewed

the licensee's administrative controls and implementing procedures, and observed licensee performance in this area, including corrective action for problems identified.

While preoperational testing of safety systems has not yet begun, preparations including hydrotests, flushing, initial testing, and preoperational testing of non-safety systems have begun. These activities have identified interface problems relating to coordination and communications between involved groups, and problems related to procedures, training, system maintenance, and cleanliness. Additionally, recent changes to the licensee's turnover procedures permits preparatory activities to be conducted in parallel with system completion. This change permits the preparatory activities to be performed on systems having a greater number of open punch list items. The punch list items and the problems identified above have had a major influence in extending the completion time of ongoing tasks, and have impacted the release of safety systems for preoperational testing.

Subsequent to this evaluation period, the licensee made several changes in organization and responsibility assignments. These changes include establishment of a System Completion Organization reporting directly to the Site Manager and the assignment of an Assistant Manager for Startup Testing reporting directly to the Assistant Vice President/Manager of Nuclear Operations. The initial effect from these changes appears to be positive, such as the licensee's direct control of system completion and turnover activities, and the combining and computerizing punch list tracking. However, it is too early to assess the overall effectiveness of these changes.

b. Conclusion

The licensee is not rated in this area. The large number of punch list items has increased the potential for oversights and dictates the need for disciplined tracking and timely resolutions to preclude the negation of otherwise acceptable preoperational tests.

c. Board Recommendations

Based on the increasing level of activity in this area, the board recommends that the licensee focus increased attention on this area.

B. Report Data

a. Construction Deficiency Reports (CDR)

During this SALP period fourteen 10 CFR 50.55(e) items were reported and corrective action initiated by the licensee. The nature of these reports covers a broad range of material and construction problems as listed below.

1. Radiographs of Reactor Pressure Vessel welds rejected. (Defective GE I&SE field welds)
2. ITE Electroswitch relay failure
3. Powerpiping struts (beam loading)
4. Defective microswitches
5. Drywell piping interferences
6. Tubing for traversing incore monitors (potential overstress)
7. Fisher control valves (natural frequency data)
8. Removal of pipe supports after inspection
9. Torque wrenches not properly calibrated
10. Inadequate penetration of Dravo lugs
11. Spacing of concrete anchors
12. CRD penetrations (inadequate thermal growth clearance)
13. Rockbestos coaxial cable
14. ITE circuit breakers

The licensee is responsive to the 10 CFR 50.55(e) reporting requirements. Review of interim and final reports submitted by the licensee and subsequent inspection by NRC indicates that adequate corrective actions are being implemented.

b. Part 21 Reports

The licensee issues 50.55(e) reports for all reportable deficiencies. For deficiencies reportable under Part 21, the required information is provided in the 50.55(e) report.

V. SUPPORTING DATA AND SUMMARIES

A. Noncompliance Data

Facility Name: Enrico Fermi Unit 2 Docket No. 50-341
Inspections No. 80-10 through No. 80-23
No. 81-01 through No. 81-15

Functional Areas	Noncompliances and Deviations[2] Severity Levels I	II	III	IV	V	VI	Categories Viol.	Infr.	Def.	Dev.
1. Soils and Foundations										
2. Containment and other Safety-Related Structures										
3. Piping Systems and Supports					4	1				
4. Safety-Related Components										
5. Support Systems										
6. Electrical Power Supply and Distribution										
7. Instrumentation and Control System				1		1				
8. Licensing Activities										
9. Radiation Protection, Radioactive Waste Management, and Transportation										
10. Design Control								1		
11. Quality Assurance					1					
12. Administrative Controls										
13. Preparations for Preoperational Testing										
Totals				1	5	2		1		

C. Licensee Activities

The construction status of Fermi 2 at the close of this evaluation period was approximately 87% complete, with the major efforts directed to completion of construction and systems turnover. There was no major interruption of activities. During this evaluation period the licensee identified schedule problems involving several critical path items. Those items having the greatest potential impact on the fuel load date are operator training and licensing, reactor vessel hydrotest, rod drive mechanisms and reactor internals, and balance of plant completion.

As a response to these matters, the licensee initiated organization changes which included assignment of a Site Manager with immediate control over all construction activities, including system completion and turnover; the reorganization of Project Quality Assurance, and creation of the position of Assistant Manager, Startup Testing, who reports directly to DECo Corporate management. Those changes were in place at the close of 1981.

A major area of licensee activities was related to prelicensing matters. The Atomic Safety and Licensing Board (ASLB) held a prehearing conference at Detroit, MI on July 22, 1981. The ASLB public hearing is scheduled to start on March 31, 1982 at Monroe, MI. There are two contentions remaining; construction deficiencies, and adequacy of evacuation from a local community adjacent to the plant property.

The Advisory Committee on Reactor Safeguards (ACRS) meetings were completed on August 6, 1981. The committee's report dated August 11, 1981, concluded that there is reasonable assurance that Fermi 2 can be operated at power levels up to 3292 MWT without undue risk to the health and safety of the public. This was made subject to completion of construction, staffing, and preoperational testing and also to the satisfactory resolution of the remaining NRC issues.

The licensee responded to NRC questions in support of issuance of the Final Environmental Statement (FES) and the Safety Evaluation Report (SER). The FES, NUREG-0769, was issued in August 1981. The SER, NUREG-0798, and SER Supplement No. 1, were issued in July and September 1981 respectively.

D. Inspection Activities

The team inspections and team reviews conducted at the Fermi 2 site during this SALP period consisted of one QA inspection and nine NRR team reviews. The QA inspection related to quality assurance performance in the area of mechanical and piping systems. The NRR team reviews were carried out as part of the NRR prelicensing safety evaluation. The chronological listing of these activities are as follows:

1. IE Team Inspections

DATES	REPORT NO.	INSPECTION SUBJECT
June 23-26, 1981	81-08	Mechanical and Piping Systems

2. NRR Team Reviews

DATES	TRIP REPORT ISSUED	REVIEW SUBJECT
April 27- May 1 1981	June 22, 1981	Control Room Design
May 5-8, 1981	June 3, 1981	Instrumentation & Control
May 11-15, 1981	July 21, 1981	Fire Protection
May 18-21, 1981	July 21, 1981	Licensee Qualification
June 23-25, 1981	September 2, 1981	Power Systems
July 13-17, 1981	October 29, 1981	Environmental Qualifications
July 25-28, 1981	September 8, 1981	Procedures Test
July 27-31, 1981	October 20, 1981	Seismic Qualifications
September 30- October 1, 1981	November 24, 1981	Caseload Forecast Panel

E. Investigations and Allegations

Two investigations resulting from allegations were conducted at Enrico Fermi 2 during this evaluation period. Investigation findings are documented in Investigation Reports 80-13 and 80-22.

Inspection Report 80-13. This investigation was in response to ten allegations regarding the Quality Control Program at the Fermi 2 site. Specific allegations related to improper welding quality control and the improper disposition of identified nonconformances. The investigation included the inspection of components and the review of drawings, nonconformance reports and other documents related to the allegations. The investigation revealed that all of the problems described in the allegation had been previously identified and documented as nonconformances. The disposition of nonconformances was reviewed and in all cases was considered to be appropriate.

Inspection Report 80-22. This investigation was in response to nine allegations regarding improper disposition of Deviation Disposition Reports (DDRs), documentation deficiencies, qualification of personnel, and inadequate management support for field inspectors. With the exception of documentation deficiencies, the investigation did not substantiate the allegations. The investigation identified two items of noncompliance relating to the alleged deficient documentation as follows:

1. Failure to provide a documented procedure for the installation of instrument tubing.

2. Failure to adequately identify insert material heat numbers.

F. Escalated Enforcement Actions

There were no escalated enforcement actions during the evaluation period.

G. Management Conferences

Inspection Report 80-12, dated September 19, 1980, documents the management meeting held at NRC's request to discuss the regulatory performance of the activities at Enrico Fermi 2, as concluded in the Systematic Assessment of Licensee Performance program (SALP-1). The licensee's performance was considered to be adequate.

Inspection Report 81-01, dated January 26, 1981, documents the management meeting held at the licensee's request to promote better understanding of Region III activities and concerns relating to the Fermi 2 project. Subjects discussed at the meeting included the SALP program, NRC enforcement policy, and preoperational activities.