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July 2, 1990
NRC-90-0091



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. NPF-43
- 2) NRC Inspection Report No. 50-341/86011,
dated June 13, 1986
- 3) NRC Inspection Report No. 50-341/87028,
dated October 16, 1987
- 4) Detroit Edison letter NRC-88-0237,
dated October 18, 1988
- 5) NRC letter dated August 24, 1989

Subject: Deletion of 100% Audit Coverage of Technical
Specification Line Items

In April 1986, NRC Inspection 86011, Open Item No. 4, stated that Fermi 2 did not have a documented policy for the time frame in which to complete 100% audit coverage of the Technical Specification line items. Subsequently, Detroit Edison developed a program and revised the applicable procedures to establish a five year time frame in which to complete such audits. The five year time frame began with fuel loading in March of 1985.

In August 1986, Detroit Edison developed a Technical Specification Line Item Matrix which would enable management to assign and track the Technical Specification line items for audit purposes. Approximately three man months were spent on this effort.

The first Technical Specification line item audits began in June 1987. The first five year cycle was completed in March 1990. During that cycle of audits, the audit program did not identify any violation of the Technical Specification sections 2, 3 and 4 items. In 1989 alone, Detroit Edison spent in excess of 3770 man hours conducting Technical Specification line item audits. During the five year cycle approximately 15,000 man hours were spent with no significant findings.

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The commitment to audit 100% of all the Technical Specification line items every five years has required significant Quality Assurance (QA) resources. Rather than adhere to a strictly prescribed compliance-based schedule, QA should have the flexibility to focus audits in suspected weak performance areas or on items significantly affecting plant safety and reliability.

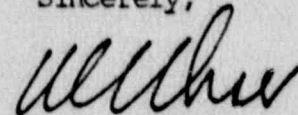
Our preference is to continue to implement our performance-based auditing techniques. The performance-based auditing was introduced by the NRC with NUREG/CR-5151 in June 1988. This audit concept provides much more benefit for the effort expended than a purely compliance-based audit which is characteristic of the Technical Specification line item audits.

In October 1988, a request was submitted to the NRC to grant relief from the 100% audit of Technical Specification line items. This request was subsequently denied. However, since this request has been made, there has been increased emphasis on performance-based auditing. In addition, Detroit Edison's Technical Specification Improvement Program has been completed which provided an extensive review of the Technical Specification line items.

Detroit Edison has concluded that the Technical Specification line item audits have provided little or no benefits and is contrary to performance-based auditing. This lack of benefit was discussed with NRC (Division of Reactor Safety) personnel at the Great Lakes QA Managers meeting in May 1990. They suggested, that Detroit Edison resubmit the request to be granted relief from the commitment to perform 100% audits of the Technical Specification line items.

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

Sincerely,



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