

Detroit
Edison

Douglas R. Gipson
Senior Vice President
Nuclear Generation

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5249

July 14, 1994
NRC-94-0045

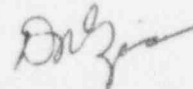
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
2) NRC Inspection Report 50-341/94007,
dated June 15, 1994

Subject: Response to Notice of Violation 94007-01

Enclosed is the response to the Notice of Violation contained in Reference 2. If there are any questions relating to this response, please contact Beth Hare, Senior Compliance Engineer, at (313) 586-1427.

Sincerely,



Enclosure

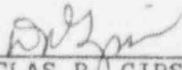
cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer
Region III

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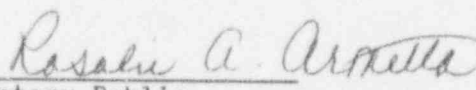
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I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


DOUGLAS R. GIPSON
Senior Vice President

On this 14th day of July, 1994, before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.


Notary Public

ROSALIE A. ARMETTA NOTARY PUBLIC STATE OF MICHIGAN MONROE COUNTY MY COMMISSION EXP. NOV. 20, 1995
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Reply to Notice of Violation 50-341/94007-01

Statement of Notice of Violation 94-007-01

"Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended on Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Item 1.c of Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, requires administrative procedures for 'equipment control (e.g., locking and tagging).' Abnormal Lineup Sheet (ALS) 94-1185 for equipment control tagging specified hanging tag E-7 on Bus 69K, position K6. In addition, Section 4.11.2.1 of Fermi Management Directive, FMD PR1, 'Procedures, Manuals, and Orders', specifies that independent verification shall be performed in accordance with Fermi Interfacing Procedure, FIP-OP1-07, 'Independent Verification'. Section 5.2.1.4 of FIP-OP1-07 requires independent verification to be completed before the activity requiring it is started, and further defines activities as release of equipment for maintenance. Step 5.2.2.1.c of FIP-OP1-07 requires that independent verification shall be performed by direct determination that affected equipment is in the correct position by a second individual.

"Contrary to the above, on May 5, 1994, tag E-7 for ALS 94-1185 was incorrectly hung and independently verified on Bus 68K, position K4 rather than the specified location."

Reason for the Violation

The root cause of the event was personnel error. This was based on a review of information and data collected by the event response team. The symptomatic errors that contributed to this event were mindset and spacial misorientation. The majority of the tags were to be hung on bus 68K position K4. The last tag was required to be hung on bus 69K position K6. This tag was required for configuration control not personnel protection. During the tagout, the last tag was incorrectly hung and verified as being correct on knife switch 68K position K4 1RG 94/86 instead of 69K position K6 1RG 94/86.

Mindset was the predominate factor leading to the personnel error in this event. The individuals involved did not adequately perform self checking which could have broken the "mindset" that all components were in the same cubicle. The spacial misorientation was most likely caused by similarities between the two buses (e.g., similar labeling).

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Corrective Actions Taken and the Results Achieved

The individuals involved were disciplined in accordance with Detroit Edison practices and policies. The Deviation Event Report, its cause and recommendations were discussed on shift with the operating crews. The area stressed to prevent recurrence was that when working on electrical panels, many devices have identical designations. An operator must use the panel or cubicle label in addition to ensuring that the operator is on the correct component. The operator must verify both the panel and device designators. This was used as an example of a method of Self Verification. This action was completed June 20, 1994.

Corrective Action To Be Taken To Prevent Recurrence

No further corrective action was determined to be necessary.

Date When Full Compliance Will Be Achieved

Detroit Edison is currently in compliance with Technical Specification 6.8.1.a.