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EF2-63508

Mr. C.E. Norelius, Director
Division of Projects and Resident Programs
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Noncompliance at Enrico Fermi Unit 2 - IE Report 50-341/83-05.

Dear Mr. Norelius:

This letter responds to the items of noncompliance described in your IE Report No. 50-341/83-05. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Messrs. B.H. Little, P.M. Byron and H.M. Wescott on January 1 through February 28, 1983.

The items of noncompliance are discussed in this reply as required by Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

The enclosed response is arranged to correspond to the sequence of items cited in the body of your report. The number for the items of noncompliance are referenced as well as the applicable criterion.

We trust this letter satisfactorily answers the concerns raised in your report. If you have questions, please contact Mr. G.M. Trahey, Assistant Director - Project Quality Assurance.

Very truly yours,

DAW/WEM/pn

cc: Mr. Richard DeYoung, Director
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U.S. Nuclear Regulatory Commission
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THE DETROIT EDISON COMPANY
PROJECT QUALITY ASSURANCE
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/83-05

Docket No. 50-341 License No. CPPR-87

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: January 1 - February 28, 1983

Statement of Noncompliance, 83-05-01

10CFR50, Appendix B, Criterion VI, states in part, "Measures shall be established to control the issuance of documents, such as instructions and procedures,...., including changes thereto which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy..."

Section 8.3.1 of the Startup Manual requires that the review of each test procedure is complete, accurate, and up to date. Section 8.3.3 of the same document requires that the review of a Test Change Notice (TCN) shall be the same as that given any procedure revision which receives the same review and approval process as the original procedure received.

Contrary to the above, measures did not assure that documents, including changes, were reviewed for adequacy in that TCN 455 and the test procedure used for performing the Reactor Vessel Flow Induced Vibration Test (FIVT) was not reviewed for completeness and adequacy, as a result TCN 455 deleted and re-inserted steps that were not in the test procedure.

Corrective Action Taken and Results Achieved

The subject noncompliance identified a violation of Section 8.3.1 and 8.3.3 of the Startup Manual which requires the review of each test procedure and test change notice to determine that the test procedure is complete, accurate and up to date. TCN 455 revised PRET.B1113.001 in such a way as to render the FIVT procedure suspected of being incomplete and inadequate.

Startup has completed an evaluation of the preoperational test and TCN identified by the NRC Inspection. This review revealed TCN 455 deleted steps from PRET.B1113.001 which did the following:

1. Reverified a valve lineup originally performed as prerequisite 3.23 (step 6.1.2.4).
2. Filled the vessel using the condensate or RHR system after ensuring water quality was properly met (step 6.1.2.5).
3. Installed the steam separator, (steam dryer installation was optional) (step 6.1.2.6).
4. Installed the RPV head (step 6.1.2.7).
5. Continued the fill to 2'-3' above the vessel flange (step 6.2.1).
6. Took a sample from the bottom head drain (step 6.2.2).
7. Prepared the RHR system for operation in the shutdown cooling mode (step 6.2.3).
8. Placed the RWCU system into operation as necessary per the SOP (step 6.2.4).

9. Placed the RHR system into operation in the shutdown cooling mode (step 6.2.5).
10. Heated the RPV water up to a temperature of 71° - 200° F, maintaining the temperature constant with a RHR pump as necessary (step 6.2.6).

TCN 455 added several steps back in which in conjunction with steps still remaining, did the following:

1. Tensioned the head studs per an RCI Process Control Sheet which used Reference 2.3.5, "GE specification 22A2286, General Instructions for Reactor Assembly" as its base document. This procedure detailed the installation of the Shroud Head (separator) and RPV Head (step 6.2.7).
2. Removed the stud tensioning assembly and installed the pressure regulating manifold (step 6.2.8).
3. Reverified the valve lineup initially performed as prerequisite 3.23 (new step 6.2.8.1).
4. Verified water quality (Class B) and temperature (70° F) and filled the vessel utilizing the condensate system to 2'-3' above the vessel flange as read on B21-R605 (new step 6.2.8.2).
5. Commenced the heat-up of vessel water utilizing the Reactor Recirc. System (revised step 6.2.9).

In summary TCN 455, in fact, did not render the FIVT procedure incomplete and inadequate. As can be seen in the above discussion, the end result was a vessel filled to within 2'-3' of the RPV flange with Class B water, a head tensioned, and a heat-up commenced. TCN 455 did, however, erroneously state that the reason for deleting a number of procedural steps was that the "steps (were) performed per attached RCI procedure in Appendix E".

Corrective Action to be Taken to Avoid Further Noncompliance

At the time of TCN 455, all test changes were being processed in accordance with Startup Instruction 4.5.1.01, Revision 2, "Administrative Controls of Startup Originated Procedures and Test Change Notices". This allowed new procedural steps to be added to a test procedure physically separate from other steps in the same subsection of the procedure. As a result, review of TCN's and subsequent review of test results was difficult. The situation was improved by the issuance on January 10, 1983, of Revision 3 of S.I. 4.5.1.01. This revision mandated the use of a TCN for pen and ink changes, page replacements, and page additions. The result was that procedure review, test performance, and test results review were improved to prevent a recurrence of TCN 455.

The Date When Full Compliance will be Achieved

83-05-01

Full compliance has been achieved.

Statement of Noncompliance, 83-05-02a

10CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures,...., of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures..."

- a. Sections 4.5.4 and 8.3.3 of the Startup Manual state that the Test Change Notice (TCN) shall only be used when the changes are small in number.

Contrary to the above, activities affecting quality were not accomplished in accordance with appropriate instructions or procedures in that the licensee issued five (5) TCN's with changes which added 2½ to 10 pages of procedural steps.

Corrective Action Taken and Results Achieved

Corrective action was accomplished by the utilization of pen and ink changes and by page placement, as implemented by Revision 3 of Startup Instruction 4.5.1.01, "Administrative Controls of Startup Originated Procedures and Test Change Notices".

Due to the page replacement process and use of pen and ink Test Change Notices, test procedures no longer were hard to follow but flowed smoothly. The implementation of S.I. 4.5.1.01, Revision 3, resulted in Startup's decision to change the Startup Manual as TCN's no longer required limitation.

Startup revised the Startup Manual (Revision 22) Sections 4.5.4 and 8.3.3 to state, "There are two periods when modifications will be made: prior to/and subsequent to the release for performance of a test. Procedure changes prior to release for performance of a test are implemented by revising the procedure. Procedural changes required subsequent to the release of a procedure for performance of testing will normally be implemented via use of the Test Change Notice (TCN)".

Corrective Action to be Taken to Avoid Further Noncompliance

Revision 21 to the Startup Manual was in effect at the time of the NRC Inspection, and specified in Sections 4.5.4 and 8.3.3 that the TCN shall only be used when small in number. Revision 22 has been issued subsequent to the inspection, and clarifies when revisions versus Test Change Notices will be used.

Sections 4.5.4 and 8.3.3 have been revised and states, "There are two periods when modifications will be made: prior to/and subsequent to the release for performance of a test. Procedure changes prior to release for performance of a test are implemented by revising the procedure. Procedural changes required subsequent to the release of a procedure for performance of testing will normally be implemented via use of the Test Change Notice (TCN)".

Corrective Action to be Taken to Avoid Further Noncompliance (cont'd) 83-05-02a

The procedure, at the time of inspection, for TCN's was such that the TCN when incorporated in the affected test procedure was placed in the front of the procedure. This resulted in both cumbersome review and performance of the test procedure. The procedure did not flow because the TCN(s) were physically separate from other steps of the same subsection. Due to the physical separation of the TCN's, Startup required the TCN's be kept small in number and revisions be used to preclude making the procedure extremely unwieldy. In order to improve the review and performance of test procedures, Startup revised its method of implementation of Test Change Notices.

The Date When Full Compliance will be Achieved

Full compliance has been achieved.

Statement of Noncompliance, 83-05-02b

- b. Section 1 of Program Policy 5 of the Operations Quality Assurance Manual states that activities affecting quality shall be prescribed by appropriate documented instructions or procedures, and shall be accomplished in accordance with those documents.

Contrary to the above, activities affecting quality were not prescribed by documented instructions or procedures in that reactor level, pressure and temperature were controlled without benefit of written procedures during the Flow Induced Vibration Test (FIVT).

Corrective Action Taken and Results Achieved

The subject noncompliance states, that reactor level, pressure and temperature were controlled during the FIVT without benefit of documented instructions or procedures. An evaluation by Startup revealed that the reactor level, pressure and temperature were interrelated to such an extent during the FIVT that all were being controlled through a variety of techniques, all at the discretion of the STE after consultation with operations personnel. Notes as opposed to rigid procedural steps were utilized to provide the operating flexibility felt necessary to conduct the FIVT safely and expeditiously.

Reactor level was monitored on a temporary level instrument wherein a band of 360"-460" was mutually agreed to with operations personnel. In view of the fact that level changes equated to pressure changes in a corresponding direction, pressure was monitored closely to remain at 120 + 5 - 10 psig. Step 6.2.13 of the procedure detailed the use of the pressure regulating manifold to maintain this band. In fact, pressure was primarily controlled using level control. Step 6.2.16 was inserted by TCN 459 to utilize the RWCU system, as necessary, to maintain water quality in a feed and bleed operation.

In summary, pressure, level and temperature were constantly monitored to ensure all were in the specified range. Chart recordings and Data Sheet entries are available to document this fact. In short, despite the fact that detailed instructions or procedural steps were not utilized in the FIVT procedure, the test was nonetheless conducted in a safe manner which fully met the intent of the test specification.

Corrective Action to be Taken to Avoid Further Noncompliance

In response to questions posed by the NRC relative to our failing to detail activities affecting quality with appropriate documented instructions, Startup has taken a number of steps. S.I. 4.7.1.01, "Data Collection for Diagnostic Testing", was issued in mid January to provide guidance to STE's who are requested to obtain data for others so that system performance can be evaluated in an area not already detailed in a generic/specific CAIO test or Preop. test. Additionally, Startup now requires that STE's halt their testing whenever errors are detected in the System Operating Procedure (SOP) being utilized to detail activities within their test. The SOP must be revised before testing may proceed. Finally Startup

Corrective Action to be Taken to Avoid Further Noncompliance (cont'd) 83-05-02b

demands that Interim Operating Instructions (IOI's) be written for those activities which take place on a system basis when an STE is not available to provide on the spot guidance, and a SOP is not considered adequate because of the unique nature of the activity. Finally numerous training classes have been held with testing personnel to stress the need for procedural discipline and accurate, detailed test procedures.

The Date When Full Compliance will be Achieved

Full compliance has been achieved.

Statement of Noncompliance, 83-05-02c

- c. Wismer and Becker Procedure WB-Q-113, Section 5.0, states in part, "... The Project Quality Manager shall maintain a suspense log (Surveillance Report Computer Log) and assign a serial number. The PQM will assign the responsibility for dispositioning the Surveillance Report and forward the form for dispositioning".

Contrary to the above, activities affecting quality were not accomplished in accordance with appropriate instructions or procedures, that the inspectors found that surveillance reports were being dispositioned in the field without assignment of a serial number and were not being entered into surveillance log.

Corrective Action Taken and Results Achieved

The procedure has been revised and includes a flow chart depicting the processing of Surveillance Reports. All Surveillance Reports found to be properly initiated are assigned numbers, entered in the surveillance log, and processed in accordance with the procedure. The originator receives a copy after "Action Taken" is completed. Those found to address situations not within the scope of WB-Q-113 are evaluated to determine if the initiator needs further training, and a copy is returned to the originator. This will eliminate surveillance reports being discarded or dispositioned in the field without numbers having been assigned. The revision to the procedure now calls for the reporting of acceptable as well as nonacceptable situations.

Corrective Action to be Taken to Avoid Further Noncompliance

The Wismer and Becker Project Quality Manager held training sessions with Wismer and Becker Quality personnel on implementing the new revision to the procedure. Flow charts were distributed to the attendees. These training sessions covered the use of the surveillance form. In the past, these forms were used as a request for information or clarification of a situation, not for the use per the above stated procedure.

Results achieved include assurance for review of all Surveillance Reports initiated, and originators being informed of action taken.

The Date When Full Compliance will be Achieved

Full compliance was achieved upon distribution of new revision of WB-Q-113 on March 17, 1983, and training of Wismer and Becker Quality personnel held March 22 and 24, 1983.