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Nuclear
Operations

May 21, 1991
NRC-91-0065

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

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

2) NRC Letter, SALP 12 Report,
Inspection Report No. 50-341/91001,
dated April 29, 1991

Subject: SALP 12 Response

Detroit Edison is pleased with the recognition by the NRC that operation of Fermi 2 is acceptable in all areas and consistent with a conservative and safe operating philosophy. We also appreciate the recognition that our overall performance is improving and that this is the second consecutive period of improving performance trends.

In general, our views do not differ materially from those expressed in your report and our assessments are consistent with yours that overall performance is improving as evidenced by a reduced number of operating events and significantly fewer occurrences resulting from personnel error.

In the Maintenance/Surveillance area, we have previously described several improvement initiatives and are pleased that the staff's assessment in that area recognized these improvements (now shows a category 2 rating).

In Security, the declining trend noted in the previous report was reversed during this period and Security is now a solid category 1. Our efforts to maintain this improving trend will continue.

Although the category ratings for Engineering and Technical Support, Operations and Safety Assessment and Quality Verification did not change, there are continuing efforts underway to improve performance in these areas.

Detroit Edison acknowledges that performance has declined in two areas. In Emergency Preparedness, we see the decline to a category 2 as significant. Likewise, the assignment of a declining trend to the category 1 rated Radiological Controls area is significant. We are currently working on improvement programs in both of these areas and are committed to reversing these trends.

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After reviewing your report and integrating it with our own assessment, there are three broad areas which will be the focus of increased management attention: (1) Effective implementation of administrative and procedural controls; (2) timely and adequate resolution of technical problems; and (3) contractor control. Detroit Edison is committed to addressing and solving these problem areas.

New initiatives are underway or planned to emphasize key areas for improvement:

1. Focus on improving safety system availability. System outages will be carefully monitored to improve performance in maintenance planning, procedures and implementation, availability of spare parts and tools, and communications.
2. Carefully manage shutdown plant risk by thorough planning and risk assessment. Our objective is to reinforce a strong safety culture in the organization, improve communications between work groups, and minimize plant risk during outages.
3. Self-assessments and critiques of problem areas at the department level. These activities both reinforce management and supervisory expectations and provide clear direction for improved performance.

Contractor control training was developed and given to over 250 task managers and supervisors for this refueling outage. Both performance and cost measures are closely monitored and tracked to allow early identification of contractor control issues. Additionally, our quality assurance surveillances have been directed to look hard at this area.

In August of 1990, a recurring plant problem list was developed and published which gives visibility and accountability for resolution of technical and equipment problems. To date, twenty-two long standing problems have been resolved.

Management and technical resources for the main turbine generator were concentrated in a single organizational unit under experienced leadership to focus on solving turbine and generator problems. As evidence of that group's effectiveness, the December turbine repair outage was completed on schedule and, thus far, turbine activities are on schedule during this outage.

Based on NRC and our evaluations in the Emergency Preparedness area, we have taken actions to improve our future performance. We determined that we needed to do more practical training and limited scope drills in specified areas in order to increase our proficiency in handling various aspects of emergency preparedness. We conducted radiological emergency medical training and medical drills and we have increased the number of medical drills scheduled in 1991.

We have included emergency classifications as a routine part of simulator training and initiated emergency classification case studies as a part of operator requalification training. We have revised our procedure on environmental sampling and revised our training course to allow more hands-on sampling during this training. More environmental sampling training is scheduled for this year. We are working to avoid simulation wherever possible in our drills and exercises. We have also taken corrective action to improve documentation activities in the Operation Support Center and will evaluate the effectiveness of our corrective actions in future drills.

We have scheduled a "realistic casualty drill" to be conducted this year in conjunction with one of our Emergency Preparedness drills. The drill is designed to cause actual operation on mockups and a realistic time line of the events so that we may understand better how the evolutions and operations in the plant affect the timing of events and interfaces among response personnel.

The other area in which the performance rating declined was Radiological Controls. We also had detected this declining trend and have instituted actions to improve performance in this very important area. We have identified four areas of weakness, whose root cause was management and supervisor inattention. The first area was radiation protection supervisor control and accountability. To improve performance, reviews were conducted of staffing, work interfaces, shift routines and training. Based on these reviews, appropriate changes are being made. Also, single point responsibility was assigned to specific activities, so that responsibility and authority were well defined. Performance during first time evolutions was determined to be a weakness for which we have developed methodologies to address; including the assignment of a single individual responsible for the refueling floor evolution. Lack of contractor control was responsible for some of the problems during the SALP period. An HPES was performed and corrective actions are being implemented to improve contractor control in the radiation protection area, as well as site wide.

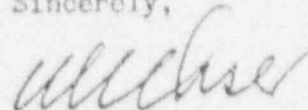
Lack of timely corrective actions was a weakness in some situations. In addition to taking action for the specific problems, a review was done of previous DERs written on radiation protection problems to identify any programmatic weaknesses. The events and lessons learned are being reviewed with the Radiation Protection personnel.

These actions and high management attention are serving to strengthen our radiological control program and will reverse the observed declining trend.

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We re-emphasize that we will operate Fermi 2 safely and with a conservative philosophy. We will continue to do that while undertaking these initiatives to improve our overall performance.

Sincerely,

A handwritten signature in cursive script, likely belonging to W. C. Rogers, is written below the word "Sincerely,".

cc: A. B. Davis
R. W. DeFayette
W. C. Rogers
J. F. Stang
Region III