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February 22, 1983
EF2-62617

Mr. W.S. Little, Chief
Engineering Programs Branch
U.S. Nuclear Regulatory Commission
Region III Office
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Noncompliance at Enrico Fermi Unit 2 - IE Report 50-341/82-14

Dear Mr. Little:

This letter responds to the items of noncompliance described in your IE Report No. 50-341/82-14. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Mr. K. R. Naidu and Mr. B.H. Little on September 8, 9, and 10, 1982.

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/DF/cp

cc: Mr. Richard DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Bruce Little, Senior Resident Inspector
U.S. Nuclear Regulatory Commission
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THE DETROIT EIDSON COMPANY

PROJECT QUALITY ASSURANCE

ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/82-14

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: September 8 - 10, 1982.

Prepared By: B.F. Kauppila
B.F. Kauppila, Lead Electrical Engineer
Construction Quality Assurance

Noted By: D. Ferencz
D. Ferencz, Acting Supervisor
Construction Quality Assurance

Approved By: T.A. Alessi
T.A. Alessi, Director
Project Quality Assurance

Statement of Noncompliance, 82-14-01A

10CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Detroit Edison Quality Assurance Manual, Section 9.0.1, states that "Activities affecting quality shall be prescribed by appropriate written instructions, procedures, or drawings and shall be accomplished with these documents."

- a. Paragraph 3.10 of the Daniel Construction Procedure AP-VII-02 states, "At any time during the review and approval of a DDR that information is determined to be inadequate, incorrect, etc., the DDR shall be returned to the person who originally provided this information, for correction, and the DDR review/approval cycle shall then be repeated from the originator's Quality Manager forward."

Contrary to the above, after it was acknowledged in the response to L.K. Comstock DDR 1757 that the DDR contained incorrect information, the DDR was not returned to the person who provided the information for correction, and the DDR review/approval cycle was then not repeated from the originator's Quality Manager forward. Instead, the DDR was voided.

Corrective Action Taken and Results Achieved

L.K. Comstock Deviation Disposition Request (DDR) #1757 was issued on May 19, 1982. During the processing of the DDR, it was determined that a nonconformance did not exist. A temporary conduit support was considered to be adequate to allow cable to be pulled. L.K. Comstock Work Instruction WI 000-03-008 Paragraph 3.1.1 established the conditions that had to be met prior to cable pulling. DDR #1757 was voided per Paragraph 3.11 of the Daniel Site Administrative Procedure AP-VII-02 on June 11, 1982. At the time of voiding Paragraph 3.11 read as follows:

- 3.11 "If, during the processing of a DDR, it is determined that no nonconformance actually existed, the person making this determination shall notify the originator's Quality Manager, who shall consult with the appropriate Contractor Project Engineer, and other appropriate Engineer for agreement that no nonconformance exists."

"If agreement is reached, a DDR void form (reference Exhibit E), shall be initiated with the required approval signatures. The originator's Quality Manager shall mark the DDR void, sign and date, and attach the void form to the DDR and transmit to Project Quality DDR Coordinator."

It did not require that the person who wrote the DDR being voided be notified. Since that time, Paragraph 3.11 has been revised to require "The originator's Quality Manager to provide the initiator of the voided DDR a copy of the void form, when the initiator is available."

Subsequent to this letter, L.K. Comstock QA/QC Manual, Section 4.3.3 and Work Instruction WI 000-03-008 were revised to include this requirement.

Corrective Action To Be Taken To Avoid Further Noncompliance

See Above.

The Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the revision of AP-VII-02.

Statement of Noncompliance, 82-14-01B

- b. Paragraph 3.11 of Daniel Construction Procedure AP-VII-02 states in part: "the originator's Quality Manager shall mark the DDR void, sign and date and attach the void form to the DDR and transmit to the Project Quality DDR Coordinator."

Contrary to the above, the LKC Assistant QC Manager, instead of the QC Manager, who was present on site, marked the DDR void, and signed and dated the DDR."

Corrective Action Taken and Results Achieved

L.K. Comstock QA/QC Manual, Section 4.1.3, Paragraph # 4.2 has been revised to read as follows:

4.2 Assistant Quality Control Manager's

"Reports to the QC Manager. Assists the Quality Control Manager in all the duties described in Section 4.1 and has full signature authority of the Quality Control Manager. Assumes all the duties of the Quality Control Manager in his absence."

Corrective Action To Be Taken To Avoid Further Noncompliance

L.K. Comstock QC management has been instructed to void DDRs only as directed by Procedure AP-VII-02.

The Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the revision of L.K. Comstock QA/QC Manual, Section 4.1.3.

Statement of Noncompliance, 82-14-01C

- c. Paragraph 4.1.5 of Daniel Construction Procedure AP-VII-02 states in part: "If it is determined that there is no nonconformance, notify the originator to remove the hold tag. When the contractor number is used, annotate log." Also, Paragraph 3.4.3 of LKC Procedure 4.11.1 states in part, "Upon closure of the nonconformance document the Hold Tags shall be removed and the Hold Tag Report shall be annotated with the removal date."

"Contrary to the above, even though DDR 1757, initiated on May 19, 1982, was closed on June 11, 1982, by marking it void, Hold Tag 1617 issued to DDR 1757 was still attached to the nonconforming conduit installation and the LKC QC Hold Tag Log indicated that Hold Tag 1617 remained open. Furthermore, even though DDR 1879 was initiated on August 19, 1982, a Hold Tag report was not initiated and maintained in the log by serial number."

Corrective Action Taken and Results Achieved

Hold Tag #1617 was removed and the Hold Tag Log was updated to reflect removal of the Tag.

Corrective Action to be Taken to Avoid Further Noncompliance

A review of the Hold Tags and Hold Tag Log is being conducted to correct any other similar discrepancies.

The Date When Full Compliance Will Be Achieved

A complete review and correction of any other discrepancies is expected by March 15, 1983.

Statement of Noncompliance, 82-14-02

10CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings."

Paragraph 9.1 of DECo Procedure PQA No. 9 states in part, "Instructions, procedures and drawings prescribing activities affecting quality shall delineate the method and sequence an activity is performed and include appropriate quantitative and qualitative acceptance criteria for determining the activity has been satisfactorily performed."

- a. Contrary to the above, LKC failed to establish qualitative and quantitative acceptance/rejection criteria relative to "adequate supports" for conduits. Consequently, LKC craftsmen and QC inspectors were unable to determine whether a conduit was adequately supported, or not, prior to initiating a cable pull.
- b. Contrary to the above, important inspection information contained in Memorandum 7-28-82 dated July 19, 1982, which stated "Class I conduit may not be supported temporarily for cable installation. Inspection of Class I conduit must be in accordance with Specification 3071-128 STD.ED," was not documented in a procedure and communicated to cognizant inspection personnel.

Corrective Action Taken and Results Achieved

L.K. Comstock's QA/QC Manual, Sections 4.3.3 and 4.3.6 have been revised for cable pulling and conduit inspection. The qualitative and quantitative acceptance/rejection criteria has been amended with reference paragraphs added to the check points. Temporary supports may no longer be used. By rewording the cable pulling procedure (Section 4.3.3) and conduit procedure (Section 4.3.6) the Quality Control Inspectors can allow cable pulling only after the QA Level I raceways have been accepted. The exception to this rule is expressed in letter EF2-58409 to the Regional Administrator of the NRC, Mr. James G. Keppler, and indicated in Section 4.3.3. This exception states in part: "any deviation from this will have to be approved by Detroit Edison Field Engineering."

Corrective Action Taken to Avoid Further Noncompliance

See Above.

Date When Full Compliance Will Be Achieved

Full compliance was achieved with the revisions of L.K. Comstock's QA/QC Manual, Sections 4.3.3 and 4.3.6.

Statement of Noncompliance, 82-14-03

10CFR50, Appendix B, Criterion XV states, "Measures shall be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition and notification to the affected organizations."

Section 16.1.5 of the DECo Quality Assurance Manual states, "Reports of non-conforming items shall be made on Deviation Disposition Request (DDR) forms to project engineering for dispositioning in accordance with Configuration Control Procedures." Paragraph 3.1.1 of LKC QC inspectors were using Field Surveillance Correction Reports (FSCRs) instead of DDRs to document nonconforming safety-related electrical conduit and conduit supports, for conditions such as inadequate spacing of conduit supports and anchor bolts, insufficient number of anchors, and damaged conduit, which were in nonconformance with the DECo Specification and drawings."

Corrective Action Taken and Results Achieved

The FSCR's in question were found to have been written to document and control Level I and II nonconformances which could be made to conform to existing Detroit Edison EF2 drawings or specifications.

Administrative Procedure AP-VII-02, Paragraph 3.13 and L.K. Comstock QA/QC Manual Section 4.11.1, Paragraph 3.2.1 were revised as follows in order to agree with present field practices:

- 3.13 "Contractors may utilize a system for recording in process discrepancies that normally would be reported as Category "B" DDR's. This system shall be in accordance with their QA Program and shall not require a DDR. Additionally, if a nonconforming item can be made to conform to a specification or drawing using approved procedures or practices, a PQA-approved method other than a DDR may be used to document and control a nonconformance."
- 3.2.1 "Field Surveillance Correction Reports shall be used to document and control Level I and II non-conformances where items can be made to conform to drawings or specifications using approved procedures or practices. FSCR's can also be used to document Level III discrepancies."

Edison QA Manual, Section 16.1.6.4 states: "other nonconformances, where an item can be made to conform to specified requirements by completion, reassembling, or other corrective means, must be documented. The DDR or other approved methods may be used to document this type of nonconformance."

Corrective Action To Be Taken To Avoid Further Noncompliance

See Above.

The Date When Full Compliance Will Be Achieved

Full compliance was achieved with the revision of AP-VII-02 and L.K. Comstock QA/QC Manual, Section 4.11.1.

Statement of Noncompliance, 82-14-04

10CFR50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are properly identified and corrected."

The Detroit Edison Quality Assurance Manual, Section 17, states, in part, "QA, QC and Test Personnel shall promptly identify and report conditions adverse to quality, such as failures, malfunctions, deficiencies, nonconformances, defective material and equipment, and procedural nonconformances. In the event...prompt corrective action is taken..."

Contrary to the above, though LKC DDR 1864 dated August 11, 1982, identified a severed cable in a tray, there was no documented indication that corrective action was taken to remove the severed cable.

Furthermore, even though LKC Field Engineering requested QC to research and furnish the cable number, this was not done. Instead, the DDR was voided.

Corrective Action Taken and Results Achieved

The cut cable in tray OK-307 has been determined to be scrap. This scrapped cable was removed prior to the issuance of the DDR Void/Revision Request Form on August 23, 1982 and the voided DDR has since been annotated by the inspector to reflect the scrap removal.

Corrective Action Taken to Prevent Further Noncompliance

A cable tray cleanup program addressed in L.K. Comstock procedure 4.3.0 includes instructions for removing damaged or deformed cable. Also, Construction QA has been reviewing DDRs to assure that none have been improperly voided.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved. Cable tray cleanup and review of DDRs by Construction QA will continue throughout construction as deemed appropriate.