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August 8, 1983
EF2-64311

Mr. R.L. Spessard, Director
Division of Engineering
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/
83-14

Dear Mr. Spessard:

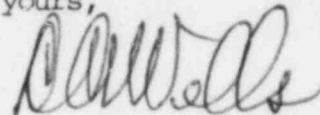
This letter responds to the item of noncompliance described in your IE Report No. 50-341/83-14. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Messrs. K. Ward, R. Cilimberg and D. Keating on May 31 through June 3, 1983.

The item of noncompliance is 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 item of noncompliance and the applicable criterion are referenced.

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

Very truly yours,



DAW/WEM/cp

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

Mr. Paul Byron, Senior Resident Inspector
U.S. Nuclear Regulatory Commission
6450 North Dixie Highway
Newport, Michigan 48166

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THE DETROIT EDISON COMPANY
PROJECT QUALITY ASSURANCE
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/83-14

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: May 31 through June 3, 1983

Statement of Noncompliance, 83-14-01

10CFR50, Appendix B, Criterion IX, states in part, "Measures shall be established to assure that special processes, including...nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements".

The Enrico Fermi Nuclear Power Plant, Unit 2, FSAR Section B17.1.9 states in part, "Procedures and practices are established and documented to provide assurance that special processes such as...non-destructive examination (NDE) are accomplished under controlled conditions. These special processes shall be accomplished in accordance with applicable codes, standards...and other special requirements using qualified personnel, procedures, and equipment".

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, 1971 Edition, Winter 1971 Addenda, paragraph NB5352 and all later editions of the Code state that linear indications are acceptable when found by liquid penetrant examination. The Enrico Fermi Nuclear Power Plant Unit 2 FSAR Section 3.9 and Table 3.2-1 specify the codes applicable for the design and installation of safety related piping systems.

Wisner and Becker Liquid Penetrant Procedure, No. WB-Q-102, Revision 15, states that linear indications are unacceptable.

Contrary to the above, linear indications were found in Instrument Weld Nos. TEW B21-N040 and TEW N11-N413A after they had previously been liquid penetrant examined and accepted by Dravo.

Corrective Action Taken and Results Achieved

As described in the NRC's inspection report, the two Dravo welds were liquid penetrant examined by two different certified Level II NDE inspectors and found to be unacceptable. Both welds had been previously examined and accepted by the same Dravo NDE Inspector. These welds were documented on a Nonconformance Report. The evaluation described in the "Corrective Action to be Taken to Avoid Further Noncompliance" paragraph will provide effective corrective action.

Corrective Action to be Taken to Avoid Further Noncompliance

A review of records for all Dravo safety related supplied pipe spools is being conducted. This will determine the number of welds that were dye penetrant examined by the inspector in question. A dye penetrant examination will be performed on a suitable sample size. It should be noted that the inspector in question is no longer employed by Dravo.

The Date When Full Compliance will be Achieved

The review, re-examination and repair, if necessary, will be completed by November 1, 1983.