

Detroit
Edison

Douglas R. Gipson
Senior Vice President
Nuclear Generation

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October 17, 1994
NRC-94-0083

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 50-341/94011,
dated September 16, 1994

Subject: Response to Notice of Violation 94011-01

Enclosed is Detroit Edison's response to the Notice of Violation contained in Reference 2.

The following commitments are being made in this letter:

1. Procedural requirements for Independent Verification and Locked Valve Verification, along with a clear statement of management's expectations with regard to these activities, will be presented in Cycle 7 Licensed Operator Requalification training for both licensed and non-licensed operators. This training is scheduled to begin in November, 1994, and will include a "hands-on" demonstration of locked valve positioning and verification techniques.
2. In the interim, operators performing locked valve verifications will be briefed by shift supervision on this event and on the proper method for performing locked valve verifications. These briefings will be completed prior to plant startup.

If there are any questions related to this response, please contact Joseph E. Conen, Supervisor, Compliance, at (313) 586-1960.

Sincerely,

Attachment

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

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PDR

210070
D. R. Gipson
Add: DRR/DRCH/HOLVB
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Mr. Encl

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.

DRG

DOUGLAS R. GIPSON
Senior Vice President

On this 17th day of October, 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.

Rosalie A. Armetta

Notary Public



Reply to Notice of Violation 50-341/94011-01

Statement of Notice of Violation 94011-01

"Technical Specification 6.8.1.d. requires that written procedures shall be established, implemented, and maintained covering the surveillance and test activities of safety-related equipment. Attachment 2 of Surveillance Procedure NPP-43.401.404, "Local Leakage Rate Testing for Penetration X-201A", requires in part, that Valve E11-F018D be restored to a "Locked Open" position.

Contrary to the above, on August 22, 1994, the NRC inspector determined that Residual Heat Removal (RHR) pump "D" recirculation isolation valve E11-F018D had not been locked in the open position in accordance with the restoration specified in Surveillance Procedure NPP-43.401.404."

Reason for the Violation

This violation occurred because training with respect to locked valve verification was not effective. Several operators performed separate checks of this valve between July 23 and August 8, 1994, none of them identifying that the valve was improperly locked. E11-F018D is a rising stem gate valve located above eye level and not within easy reach. The locking chain was threaded through the handwheel and was locked, but the free end of the chain was not secured to the valve.

The procedures for Independent Verification, Locked Valve Guidelines and Locked Valve Lineup Verification were reviewed and found to adequately describe the requirements for locked valve verification. These requirements include a "hands-on" verification of valve position and locked condition. Operators were verifying the valve as being locked open by visual observation of the valve stem in the "up" position with the chain and the lock installed. This event is believed to be a training issue rather than a series of individual performance problems because of the number of operators involved in using the inappropriate visual locked valve verification method.

Corrective Actions Taken and the Results Achieved

The locking discrepancy on E11-F018D was immediately corrected when identified on August 22, 1994. In order to provide assurance that this was an isolated problem, locked valve verifications were performed on the following systems (outside containment); Standby Liquid Control (C41), Residual Heat Removal (E11), Core Spray (E21), High Pressure Coolant Injection (E41), Emergency Equipment Cooling Water (P44), Emergency Equipment Service Water (P45), Compressed Air (P50), Standby Emergency Diesel Generator (R30), Standby Gas Treatment (T46) and Hydrogen Recombiners (T4804). The personnel performing these verifications were instructed to perform a "hands-on" positive check to ensure that locking devices were installed and secure. No additional problems were identified.

Corrective Actions To Be Taken To Prevent Recurrence

Procedural requirements for Independent Verification and Locked Valve Verification, along with a clear statement of management's expectations with regard to these activities, will be presented in Cycle 7 Licensed Operator Requalification training for both licensed and non-licensed operators. This training is scheduled to begin in November, 1994, and will include a "hands-on" demonstration of locked valve positioning and verification techniques. In the interim, operators performing locked valve verifications will be briefed by shift supervision on this event and on the proper method for performing locked valve verifications. These briefings will be completed prior to plant startup.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 22, 1994 when the locking chain on E11-F018D was secured to the valve and the valve was properly verified to be in the locked open position.