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QA-84-0081

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

Subject: Amendment to Response on Noncompliances at Enrico Fermi
Unit 2 - IE Report 50-341/83-20

Dear Mr. Norelius:

This letter amends the previous response to the items of noncompliance described in your IE Report No. 50-341/83-20. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Messrs. P.M. Byron and M.E. Parker on September 1-30, 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 amended responses are arranged to correspond to the sequence of items cited in the body of your report. The number for the items of noncompliance and the applicable criterion are referenced.

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/EHN/pn

cc: Mr. Richard DeYoung, Director
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THE DETROIT EDISON COMPANY

PROJECT QUALITY ASSURANCE

ENRICO FERMI 2 PROJECT

Amended Response to NRC Report No. 50-341/83-20

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: September 1-30, 1983

Approved by:

T.A. Alessi

T.A. Alessi, Director
Project Quality Assurance

Date:

2/13/84

Statement of Noncompliance, 93-20-01

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

DECo Startup Instruction 8.4.2.03, Supplemental Testing, Paragraph 4.3.2 requires prerequisites or precautions to be reverified after test stop/restarts to ensure the test may be resumed safely.

Contrary to the above, the inspectors observed on September 17, 1983, that not all of the required prerequisites were reverified for the performance of Test Supplement #4, dated September 14, 1983, of PRET.C1100.001.

Corrective Action Taken and Results Achieved

Supplemental Test #5 was issued which provided a formal signoff of Prerequisites 3.1, 3.2, 3.3, 3.4, 3.5, 3.7, 3.8, 3.9, 3.10, 3.11, 3.12, 3.13, 3.15, 3.16, 3.17 and 3.18. This formal reverification of prerequisites was completed on September 18, 1983, four days after Supplemental Test #4. All prerequisites were met as stated and were formally verified.

Corrective Action Taken to Avoid Further Noncompliance

Startup Instruction S.I. 8.4.2.03, Supplemental Testing is being revised to require that all applicable prerequisites be verified prior to starting/restarting any supplemental testing.

Date When Full Compliance Will be Achieved

Startup will be in full compliance and training to all personnel will be accomplished by February 15, 1984.

Statement of Noncompliance, 83-20-02a

10CFR50, Appendix B, Criterion VIII, states in part, "Measures shall be established for the identification and control of materials, parts, and components... These measures shall assure that identification of the item is maintained... These identification and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

- a. Section 4.7.2 of the DECo Startup Manual requires temporary modifications contained in approved procedures to be tagged and recorded during periods extending beyond one shift.

Contrary to the above, the licensee's measures did not assure that identification was maintained. The inspectors observed approximately 15 determinated wires which were neither tagged nor identified in the HPCI Pump Room, Relay Rooms, and Remote Shutdown Panel during HPCI preoperational testing.

Corrective Action Taken and Results Achieved

The following determinated wires were not tagged or identified in the HPCI Pump Room and Relay Room.

- Item #1 - HPCI condensate pump wires were determinated. The pump was physically removed by SCO by Punchlist card T0409 and sent off site to have motor leads extended by the vendor. The pump was re-installed, electrically terminated by Punchlist card T0155, and CAIO tested by 7.8 #3044E on October 22, 1983. There is no requirement for temporary modification on equipment removed for construction/rework functions. This equipment was not involved in the portions of the preoperational test which were performed on that date. The work was listed in the "Test Release Package" as an exception.
- Item #2 - HPCI vacuum pump wires were determinated. The pump was physically removed by SCO on Punchlist card T0409 and sent off site to have motor leads extended by the vendor. The vacuum pump was re-installed, electrically terminated by Punchlist card T0156, and CAIO tested by 7.8 #3044E on October 22, 1983. There is no requirement for temporary modification on equipment removed for construction/rework functions. This equipment was not involved in the portions of the preoperational test which were performed on that date. The work was listed in the "Test Release Package" as an exception.
- Item #3 - Two wires were determinated in cabinet E4150-C002. Discrepancy was corrected via NCR #83-896 and Punchlist card T0169 which removed the wires of concern.

Corrective Action Taken and Results Achieved, 83-20-02a (cont'd)

- Item #4 - Exposed thermocouple wires from electrical cabinet E41-C002. Discrepancy was corrected via NCR #83-896 and Punchlist card T0169. Thermocouples were not involved in the portions of the preoperational test being performed at that time.
- Item #5 - Two wires in panel H11-P620 were determined. Cables were found to be spare cables and tagged as such on the night of September 16, 1983.
- Item #6 - HPCI flow controller on Div. II Remote Shutdown Panel was disconnected. The flow controller is scoped to the C3500 system and was not involved in any portion of the E4100 preoperational test. The cables have been reconnected.

Corrective Action Taken to Avoid Further Noncompliance

Revision 2 to Interim Temporary Modification Procedure 12.000.25T, approved November 22, 1983, was written to address identification and tagging of lifted wires/leads. This revision provides a lifted wire control sheet and provides identification of wires/leads by a yellow information tag. It can be noted that Revision 2 to 12.000.25T was being prepared at the time this noncompliance was identified and was not a result of this finding.

PPM Procedure 7.27 "Project Housekeeping", Revision 1 was issued January 30, 1984. This revision has included the requirement that all determined electrical wiring shall be tagged for identification and jurisdiction. This procedure applies to all site contractors. In addition, SCO Procedure 13.1 "Surveillance Coordination" was issued January 26, 1984, and requires Project Completion Organization (PCO) inspectors to perform surveillances to ensure compliance with the tagging requirements in PPM 7.27.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Statement of Noncompliance, 83-20-02b

DECo Quality Assurance Procedure 8.0.1 states, "Written procedures shall be implemented for identification and control of material, parts, and components to assure use or installation of correct and accepted items only."

Contrary to the above, on September 7, 1983, the inspectors observed three wire baskets which contained Balance of Plant and QA Level 1 (Divisions 1 and 2) cable. None of the baskets or cable was identified, with the exception of three cables taped together with a scrap tag. The baskets were located outside the DECo Electrical Warehouse and were among many covered wooden boxes which were being stored.

Corrective Action Taken and Results Achieved

The specific baskets in question were tagged as having scrap material.

Corrective Action Taken to Avoid Further Noncompliance

Procedure 12.000.55 has been modified to indicate that all scrap containers should be clearly labeled "Scrap - Not for Plant Use." All Nuclear Procurement warehouse personnel have been notified of this requirement.

In addition, PPM Procedure 7.27 "Project Housekeeping" has been revised to be more specific in housekeeping inspection requirements. PPM Procedure 7.38 "Storage and Handling of Materials" has been revised to better identify the status of material in temporary storage.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

The following discussion addresses Statements of Noncompliance 83-20-03b and 83-20-03c.

Statement of Noncompliance, 83-20-03b

Section 5.4 of ANSI N45.2.2 requires material QC inspection personnel to designate all material inspected as either "Acceptable" or "Unacceptable" and to tag the material. In several areas throughout the site, "Accept" tags were not placed on components such as 8-inch elbows and unistrut bundles.

Statement of Noncompliance, 83-20-03c

Section 5.3.2 of ANSI N45.2.2 requires all nonconforming materials to be identified with a "Hold" or "Reject" tag and, when practical to be placed in a segregated area or removed from the project site to prevent inadvertent installation or use. A Class 1 valve was located in the warehouse with an "Accept" tag attached that had "QC HOLD" written on the tag, and four other safety-related items had both "Accept" and "Hold" tags on them.

Corrective Action Taken and Results Achieved

The inspection period for this report was the month of September 1983, when we were in the early phase of transition from the Project to Nuclear Operations control of material. The inspection occurred when we were seeking to identify material brought into the warehouse from vendors. This material had not been completely identified and was not being maintained in a defined holding area.

The material was received, in some cases, with tags on either the container or pallet indicating a "hold" and "accept" condition. It is recognized that this situation does not fulfill our commitment to the NRC for warehousing. Consequently, we plan remedial action in the short run to clearly identify material in the transition process and to not issue any such material until and unless it is cleared of all hold tags by Quality Assurance. All instances of multiple tags or those not specifically identifying material for acceptance and hold conditions are being corrected. All tags on pallets will be removed unless they particularly relate to the material on them and such material is not subject to additional items being added to the pallet.

Corrective Action Taken to Avoid Further Noncompliance

The long run corrective action will be to only receive and maintain properly tagged material in the warehouse under our control which is obtained and processed according to our procedures and newly developed QC requirements.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by March 1, 1984

Statement of Noncompliance, 83-20-03e

Section 6.1.2 of ANSI N45.2.2 requires Level D storage areas (outdoor) to be well drained, but an outdoor storage area was observed in which approximately ten sections of Class 1 square tubing were partially submerged in water.

Corrective Action Taken and Results Achieved

French drains were installed in several storage areas. One storage area was elevated with additional rock material. All storage areas were inspected to insure that in case of heavy rains that all material was on dunnage and out of standing water.

Corrective Action Taken to Avoid Further Noncompliance

To avoid noncompliances similar to the example cited, each external storage area is inspected at least every other day by Detroit Edison and by the responsible contractor.

On a broader basis, PPM Procedure 7.27 "Project Housekeeping" is being revised to be more specific in housekeeping inspection requirements. PPM Procedure 7.38 "Storage and Handling of Materials" is being revised to better identify the status of material in temporary storage.

Date When Full Compliance Will be Achieved

The external storage area inspection activity is in place. The procedure revisions have been issued.

Statement of Noncompliance, 83-20-03f

Sections 2.72 and 2.73 of ANSI N45.2.2 require material classified to Level B and C storage to be protected from airborne particles. On the Level B and C warehouses, the truck entrance doors are allowed to remain open during working hours and several components were observed with cracked open containers and excessive dust. These items included valves, portland cement, pump shafts, and standby gas treatment filters.

Corrective Action Taken and Results Achieved

During the time the inspection was conducted, Nuclear Administration was in the process of transitioning control of material in the warehouses.

In the course of the transition, there was considerable traffic in and around the warehouses. Also, the warehouse doors were, by necessity, left open for extended periods to accommodate the relocation of material and to cool the warehouses. These two factors contributed to the excessive dust observed.

Since then, the transition has been completed. The items observed are currently under review and will be cleaned up and brought under the Nuclear Procurement storage program, or will be dispositioned elsewhere.

Corrective Action Taken to Avoid Further Noncompliance

The normal practice, now, is to have the main doors open only when loading or unloading, and housekeeping is being emphasized.

Recognizing that instances may occur when the doors are open for extended periods, a moveable barrier is being used to control entrance to the warehouse.

In addition, paving of the areas around the warehouse this summer coupled with the fact that traffic and access is now restricted, will reduce the generation of dust.

Detroit Edison believes these actions will preclude this condition from recurring, and will continue to monitor these warehouses to ensure compliance.

Date When Full Compliance Will be Achieved

Review, clean up and dispositioning of items transitioned to Nuclear Procurement will be completed by March 1, 1984.

Statement of Noncompliance, 83-20-07a

10CFR50, Appendix B, Criterion VI, states in part, "Measures shall be established to control the issuance of documents... These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

DECO Operational Quality Assurance Manual, Program Policy 6, Section 1, states in part, "Measures shall be established to control the preparation, revision, issuance and use of documentation which prescribes activities effecting quality to assure that they are reviewed for adequacy, approved for release by authorized personnel, and are distributed in a timely manner to the location where the prescribed activity is performed."

DECO Quality Assurance Manual, Section 5.0.1, states in part, "Written procedures shall be implemented...to assure documents, including changes thereto, prescribing activities effecting quality have been reviewed for adequacy and approved for release by authorized personnel, and are properly distributed and used at the work place where these activities are performed."

- a. Contrary to the above, the inspectors found that Administrative Procedure 12.000.27, Material Receiving, Inspection, and Status Revision 4, which was approved on June 21, 1983, references procedures which were made inactive on October 26, 1982, and which were subsequently cancelled on July 11, 1983.

Corrective Action Taken and Results Achieved

Detroit Edison Administrative Procedure 12.000.27 has been revised and the cited references 3.7.10 and 3.7.11 have been corrected.

Corrective Action Taken to Avoid Further Noncompliance

POM Procedure 12.000.07 "Plant Operations Manual Procedures" places the responsibility for ensuring correct use of references in procedures on the Section Heads.

Plant Order EFP-1053 was issued and approved by the Superintendent Nuclear Production on February 2, 1984. This Plant Order endorses the requirements of POM 12.000.07 and directs all Nuclear Production personnel that are involved in reviewing procedures to carefully examine proposed procedures or revisions, including correct references.

The Plant Order further directs Nuclear Administration to review procedures for correct use of references. Detroit Edison believes that this directive provides sufficient checks and additional assurance of correct references in procedures.

Amended Response to NRC Inspection Report No. 50-341/83-20

Date When Full Compliance Will be Achieved, 83-20-07a

Full compliance has been achieved.

Statement of Noncompliance, 83-20-07b

Contrary to the above, the licensee's contractor, Daniel International Corporation, cancelled Administrative Procedures AP-IV-13, titled Cable Pull Cards, and AP-IV-14, titled Traveler Control, on July 14, 1983. The superceding procedures to cover the same work activities had not been issued as of September 20, 1983.

Corrective Action Taken and Results Achieved

Daniel International Corporation Administrative Procedure AP-IV-13 "Cable Pull Cards" had been re-instated pending issue of PPM 7.36. PPM 7.36 was subsequently approved January 6, 1984, and is the superceding procedure for AP-IV-13.

Procedure AP-IV-14 "Traveler Control" will not be superceded by a Detroit Edison PPM procedure. Each contractor or Detroit Edison organization performing work that requires a traveler has an approved procedure.

Corrective Action Taken to Avoid Further Noncompliance

Detroit Edison Information Systems has been notified to not cancel Daniel procedures without the initials of the Edison Procedures Coordinator. The Procedures Coordinator will not initial procedures until a review of both the superceded and superceding procedures is complete and discrepancies resolved.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Statement of Noncompliance, 83-20-07c

Projects Procedure PPM 2.14, Distribution Control, dated October 21, 1982, Section 6, requires each reproduced document to be appropriately stamped. PQA letter dated November 12, 1982, requires all procedures or revisions issued after November 12, 1982, to be stamped "Controlled". The inspectors found four procedures and/or revisions in the QC Receipt Inspectors PQAP Manual (Controlled Manual No. 132) which were issued after November 12, 1982, and which were not stamped "Controlled".

Corrective Action Taken and Results Achieved

A complete review was made by a member of the EF2 Document Control Organization of each PQAP Manual, including the one used by the Receiving Inspectors. During this review, all PQAPs that were not already stamped "Controlled" were so stamped.

Corrective Action Taken to Avoid Further Noncompliance

The administrative controls in place should assure no recurrences of this problem.

The general commitments by Edison made to the NRC by telephone involve procedure review, special audits, and personnel training as part of the corrective action program. Concerning the violations deemed to be the responsibility of Procurement QA, several actions have been taken or are in progress. Specifically, discussions with the Receiving Inspector established that they know and understand the requirements. New procedures are being published to facilitate the transition from the Construction to the Operations phase. These procedures will be presented, one at a time, in formal training sessions and will be implemented immediately following the meeting. Receiving Inspection and warehousing will be audited placing emphasis on equipment maintenance and identification and any items identified in this NRC audit.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Amended Response to NRC Inspection Report No. 50-341/83-20

Items 83-20-05 and 83-20-08 are listed as unresolved items in Inspection Report 83-20. Detroit Edison will pursue closure of these items with the resident inspectors and is withdrawing our previous response given in EF2-66487, of December 19, 1983.