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December 1, 1983
EF2-66481

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 50-341/83-21

Dear Mr. Spessard:

This letter responds to the items of noncompliance described in your IE Report No. 50-341/83-21. This inspection of Enrico Fermi Unit 2 construction site activities was performed by Mr. S.G. DuPont on August 3 through September 16, 1983.

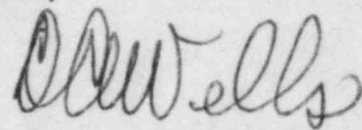
The items of noncompliance are discussed in this reply as required by Section 2.201 of the NRC's "Rules of Practice, Part 2, Title 10, Code of Federal Regulations.

The enclosed 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 is referenced.

In response to the NRC request regarding actions taken to improve the quality of the conduct of the preoperational test program at Enrico Fermi 2, Detroit Edison is currently preparing a response to submit to the NRC. All organizations associated with the preoperational test program have been directed to review and report on procedural changes that have been implemented in the program since January, 1982. This information is being summarized and will be sent to the NRC in January, 1984.

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
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Paul Byron, Senior Resident Inspector
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NRC Follow-Up Book/NRC File
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THE DETROIT EDISON COMPANY
PROJECT QUALITY ASSURANCE
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/83-21

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: August 3 through September 16, 1983

Approved by:

T.A. Alessi (fm)
T.A. Alessi, Director
Project Quality Assurance

Date:

12/1/83.

Statement of Noncompliance, 83-21-03

10CFR50, Appendix B, Criterion XI, states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures...". Startup Instruction 8.4.2.03, Section 4.4.1, states in part, "The following situation will require generic CAIO retesting...corrective maintenance performed after original CAIO testing has been completed."

Contrary to the above, the generic CAIO retesting was not done for the Division 1, safety related spare battery charger (2A1-1) after corrective maintenance was performed.

This is a Severity Level IV violation.

Corrective Action Taken and Results Achieved

Generic CAIO retesting on charger 2A1-1 will be done to insure that it performs satisfactorily.

Corrective Action Taken to Avoid Further Noncompliance

A formal procedure which defines the requirements for retesting, Startup Instruction 8.4.2.03, Supplemental Testing was approved on October 4, 1982.

Date When Full Compliance will be Achieved

CAIO testing of charger 2A1-1 will be completed by December 30, 1983.

Statement of Noncompliance, 83-21-04

10CFR50, Appendix B, Criterion XI, states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents." The vendor manual for the safety related battery chargers (C&D battery) requires that after a modification or corrective maintenance is performed, the chargers have to be rebalanced.

Contrary to the above, the licensee's preoperational, CAIO, and maintenance procedures did not incorporate the requirement to re-balance the safety related battery chargers after modification or corrective maintenance had been performed.

This is a Severity Level IV violation.

Corrective Action Taken and Results Achieved

Neither PRET.R3201 or CAIO.000.019 were written to perform retest after maintenance. PRET.R3201.001 was written to verify that the 130/260 Volt DC system meets its design requirements. CAIO.000.019 was written to perform initial calibration on the battery chargers with the chargers in the condition shipped by the vendor. The vendor manual contains section 2.6 "Preliminary Instructions" in which all recommended CAIO activities are specified. CAIO.000.019 contains all of these activities. It is adequate for its intended purpose, which is initial calibration, but inadequate for post maintenance testing.

The battery charger instruction manual contains instructions for re-balancing the chargers. Re-balancing is necessary after "Field Modifications". These instructions are in the "Corrective Maintenance" section of the manual and should be addressed in the Battery Charger Maintenance Instruction "MIE.000.002 Battery Chargers 130V". This Maintenance Instruction does not have balancing instructions included, but references the vendor manual.

Corrective Action Taken to Avoid Further Noncompliance

A formal procedure which defines the requirements for retesting, Startup Instruction 8.4.2.03, Supplemental Testing was initially approved on October 4, 1982. In addition, Maintenance Instruction MIE.000.002 will be revised to include balancing instructions. The entire preoperational test, PRET.R3201.001 will be repeated using a new revision, Revision 2.

Date When Full Compliance will be Achieved

- a. Startup Instruction 8.4.2.03 is in effect at this time and all Startup personnel have received training on this instruction.
- b. MIE.000.002 and PRET. R3201.001 will be revised and the test repeated prior to June, 1984.

Statement of Noncompliance, 83-21-05

10CFR50, Appendix B, Criterion III, states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled." FSAR, Section 8.3.1.1.9, states in part, "The 120/120 Vac, 15 kva, regulated power for instrumentation loads, has an output variation of ± 0.5 percent for input variations of +10 percent, -20 percent." Test and Startup Administrative Procedures Manual, Section 4.9.6, states in part, "After receipt of a written reply from Edison Engineering to the Startup Field Report (SFR), the design change may be made permanent when the required design change document is issued." CAIO Procedure, CAIO.000.137, states in part, "The required output setvoltage shall be $120 \pm .25$ Vac."

Contrary to the above, the following instances were noted during the review of preoperational test results for Instrument and Control Power System Preoperational Test, PRET R3100.001 where management controls failed to assure that appropriate quality standards are specified and included in design documents, and to control deviations from such standards.

- a. Contrary to the FSAR, Section 8.3.1.1.9, the preoperational test results were accepted with an acceptance criterion that deviated outside the FSAR requirement without an appropriate request for a permanent revision to the FSAR.
- b. Contrary to the CAIO procedure, a incorrect value was recorded for the required setvoltage and was subsequently accepted by startup, and audited and accepted by Quality Assurance.

This is a Severity Level IV violation.

Corrective Action Taken and Results Achieved

- a. An FSAR Change Notice, FCN-83-181 has been written and approved that will bring FSAR Section 8.3.1.1.9 into agreement with the preoperational test results. This change will appear in Amendment 52 of the FSAR which is scheduled to be issued in January, 1984.
- b. No corrective action is necessary for the following reasons:
 1. The STE misinterpreted the intent of step 7.1.1 on 7.8 #496 BE. He recorded the voltmeter M&TE number used to verify the input voltage instead of the regulator output voltage.
 2. The intended regulator output voltage value is recorded in step 7.1.2 of the same test form. The recorded value is within the acceptance criteria stated in step 7.1.1.

Corrective Action Taken to Avoid Further Noncompliance

- a. Although Detroit Edison has continuously updated the FSAR since the time it was first submitted, additional measures have been taken to further assure its accuracy.
1. An FSAR accuracy review has been initiated that will be performed by the individuals assigned responsibility for FSAR sections. Personnel from Nuclear Production, Startup and Project Design will assist Nuclear Engineering in this review. The entire FSAR will be included in the accuracy review. Necessary revisions will be processed and issued in an amendment to the FSAR.
 2. Startup Engineering Assistance is re-reviewing preoperational test results on preoperational tests performed before issuance of the noncompliance. The purpose of this review is to ensure that preoperational test results are in agreement with criteria stated in the FSAR. In addition, Field Engineering's Work Procedure FEWP-14 is being revised to assure that test results from all future preoperational tests are in agreement with criteria stated in the FSAR.
 3. A directive has been issued re-emphasizing Detroit Edison Policy to maintain the accuracy of the FSAR.
- These measures will provide additional assurance that the FSAR will accurately reflect the plant design and proposed method of operation.
- b. A letter (SU-12,017), pertaining to test results review, was sent to all STEs shortly after the noncompliance was issued by the NRC. This letter was the corrective action for an interim period. Since then, Startup Instruction 8.4.2.05 (Test Results Package Preparation/Review) has been revised to address the subject of test results review.

Date When Full Compliance will be Achieved

- a.
1. Revisions resulting from the accuracy review will be issued in an FSAR Amendment in March, 1984.
 2. Reviews on previous preoperational test results will be completed in January, 1984.
 3. FEWP-14 will be revised in January, 1984.
- b. Startup Instruction 8.4.2.05, Revision 2 was approved on November 9, 1983.