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December 10, 1983
LF2-66485

Mr. J.F. Streeter, Chief
Engineering - Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Noncompliance at Enrico Fermi Unit 2 - IE Report 50-341/83-22

Dear Mr. Streeter:

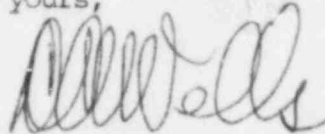
This letter responds to the item of noncompliance described in your IE Report No. 50-341/83-22. This inspection of the Enrico Fermi Unit 2 construction site activities was performed by Mr. S.G. DuPont on October 4 through 21, 1983.

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 is referenced.

We trust this letter satisfactorily answers the concern raised in your report. If you have questions, please contact Mr. G.M. Tiahey, 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
U.S. Nuclear Regulatory Commission
6450 North Dixie Highway
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Mr. J.F. Streeter, Chief
December 10, 1983
EF2-66485
Page 2

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THE DETROIT EDISON COMPANY

PROJECT QUALITY ASSURANCE

ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/83-22

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

Inspection at: Fermi 2 Site, Newport, Michigan

Inspection Conducted: October 4 through 21, 1983

Approved by:

T.A. Alessi

T.A. Alessi, Director
Project Quality Assurance

Date:

Dec 10, 1983

Statement of Noncompliance, (83-22-03)

10CFR50, Appendix B, Criterion XI, states in part, "Test results shall be documented and evaluated to assure that test requirements have been satisfied." FSAR, Section 14.1.1.6.5, states in part, "The Preoperation Test Results Package is reviewed by the responsible Lead Startup Test Engineers and the Startup Director before being submitted to the TRC for approval. This package consists of Preoperational Test data and results." Regulatory Guide 1.68, states in part, "Preoperational procedures should prescribe the data to be collected and the form in which it is to be recorded." Regulatory Guide 1.68, also states in part, "The completed procedure, along with the data collected, will be retained as part of the plant historical record." IEEE Standard 450-1975, states in part, "Read and record the temperature of battery electrolyte for an average temperature (suggested every sixth cell)."

Contrary to the above, the following preoperational test procedures did not collect or retain supportive test data.

- a. Preoperational Test Results Packages for Preoperational Tests, PRET R3201.001 130/260 VDC Systems and PRET R3202.001 24/48 VDC Systems did not contain supportive preoperational test data and these test results were reviewed, approved, and accepted by the responsible Lead Startup Test Engineer, Startup Director, and the TRC.
- b. Preoperational Test, PRET R3201.001 130/260 VDC Systems did not prescribe collection and retaining of actual test durations during the battery service (duty low cycle) tests.
- c. Preoperational Tests, PRET R3201.001 130/260 VDC systems and PRET R3202.001 24/48 VDC Systems did not prescribe collection and retaining of battery electrolyte temperature for an average temperature during the battery performance (capacity 1 tests).

This is a Severity Level IV violation.

Corrective Action Taken and Results Achieved

Both PRET R3201.001 130/260 VDC System and PRET R3202.001 procedures are being revised to include all required raw data. After revision they will be re-submitted to the review and approval process before being re-released. The entire revised procedures will be re-performed to ensure adequate data to provide assurance the acceptance criteria have been met and is available. This data will meet the requirements of Regulatory Guide 1.68.

Startup Instruction 8.4.2.01 "PREOP/ACPT Procedure Preparation" was revised on November 14, 1983, to clarify the responsibilities of the procedure reviewers to ensure that procedures are adequately reviewed before approval. Startup Instruction 8.4.2.05 "Test Results Package Preparation/Review" was revised on November 6, 1983 and included clarification of the responsibilities of the test results reviewers.

Corrective Action Taken to Avoid Further Noncompliance

All Startup Personnel have received training to ensure that they are cognizant of the requirements of S.I. 8.4.2.01 and S.I. 8.4.2.05.

The Date When Full Compliance will be Achieved

Failure to have adequate control has been corrected by the issuing of S.I. 8.4.2.01 and S.I. 8.4.2.05, and completion of subsequent training.

The inadequacies of PRET R3201.001 130/260 VDC System and PRET R3202.001 24/48 VDC System will be corrected and the testing repeated so that sufficient raw data is collected to provide assurance that acceptance criteria have been met, before June 1984.