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May 23, 1995
NRC-95-0052

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 50-341/95006 (DRSS),
dated April 19, 1995

Subject: Reply to a Notice of Violation (95006-01)

Enclosed is Detroit Edison's response to the Notice of Violation (NOV) contained in Reference 2. The NOV concerns medical evaluations for watchpersons which were not performed as required, in some cases.

The following commitment, as noted in the response to the NOV, is being made in this letter:

The procedure for Initial Training, Requalification and Firearms Policy that defines security training requirements has been revised to provide clear assignment of the responsibility for ensuring medical assessments are conducted. The revision also requires verification of the physical assessment prior to an officer assuming security duties.

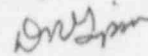
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As agreed between J. R. Creed of NRC Region III and L. S. Goodman of The Detroit Edison Company, this response is being submitted by May 26, 1995. If there are any questions related to this response, please contact either Ken Riches, Compliance Engineer at (313) 586-5529 or Joseph H. Korte, Director, Nuclear Security, at (313) 586-1095.

Sincerely,



Enclosure

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
A. Vogel
Region III

Response to Notice of Violation 50-341/95006-01

Statement of Notice of Violation

Section 2E of Fermi Facility Operating License No. NPF-43, issued March 20, 1985, and amended August 5, 1988, requires that the licensee maintain in effect and fully implement all provisions of the Commission approved Physical Security Plan and Security Force Training and Qualification Plan.

Section 3.1.2 of the Security Personnel Training and Qualification Plan states that "Watchpersons are examined to determine whether they meet the requirements of 10 CFR 73, Appendix B, I.B.1.a. Section I.B.1.a of Appendix B to 10 CFR Part 73 states that individuals whose security tasks and job duties are directly associated with the effective implementation of the licensee physical security and contingency plans shall have no physical weakness or abnormalities that would adversely affect their performance of assigned security job duties

Contrary to this requirement, record reviews of ten watchperson personnel showed that three of the watchpersons were assigned to perform security duties without a physical examination being performed to determine whether they meet the requirements of 10 CFR 73, Appendix B, I.B.1.a.

Reason for the Violation

The procedure for Initial Training, Requalification and Firearms Policy was reviewed and it was discovered there was no clear procedural guidance for the medical assessment process of contract officers (watchpersons). Also, the procedure did not define who is responsible for ensuring these assessments are conducted and verified as completed prior to a contract officer assuming security duties. The procedural guidance for Detroit Edison security officers was clear and assigned responsibility for the medical assessment process.

In the past the General Supervisor of Security Operations and the Security Operations Support staff shared the responsibility for ensuring the medical assessments were completed. This was accomplished by having the prospective contract officer complete a medical history questionnaire (physical assessment form) on the first day of security training. The completed form was then forwarded by the security training staff to the General Supervisor who in turn forwarded the completed form to the company medical department for a medical evaluation and determination of the need for any additional examinations or evaluations. The results of the assessment were then transmitted to the General Supervisor in the form of a letter from the company medical department that would document the contract officers' medical fitness to perform security duties (i.e., medical assessment). However, during this particular time period the

General Supervisor was on a temporary assignment and the individual that assumed the position was not aware of the process.

Corrective Actions Taken and the Results Achieved

The contract officers involved were removed from duty immediately upon discovery that their medical assessment documentation was incomplete. The medical department conducted a records search to determine if the required medical history form was completed. This records search produced negative results. The officers involved completed the required questionnaire and the forms were forwarded to the company medical department for evaluation. Subsequently, the contract officers were certified by the medical department and returned to duty. The medical evaluation letters were placed in each contract officer's training file. A review of the medical assessments of all contract officers was conducted by the security organization. Medical evaluation letters were available for all other contract officers. These letters were placed in each contract officer's training file.

The Supervisor, Security Operations Support has assumed all responsibilities for ensuring medical assessments for contract officers are completed prior to performing security duties. The training checklist that is used to verify each officers completion of required training was revised to include an item for completion of the physical assessment form. The security staff responsible for conducting initial training was briefed on the changes to the checklist.

Corrective Actions Taken to Prevent Recurrence

The procedure for Initial Training, Requalification and Firearms Policy was revised to include the physical assessment requirements for contract officers prior to an officer assuming security duties. This is accomplished by an enclosure to the procedure that details the requirements of initial security training.

The procedure revision also assigns the Supervisor, Security Operations Support, the responsibility of ensuring physical assessments are completed. The company medical department was informed by the General Supervisor that all medical assessment results will be forwarded to the Supervisor, Security Operations Support.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 4, 1995 when the revision to Initial Training, Requalification and Firearms Policy procedure was approved.