

**Detroit  
Edison**

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April 19, 1984  
EF2-67811

Mr. James G. Keppler  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: Fermi 2  
NRC Docket No. 50-341

Subject: Noncompliance at Fermi-2  
Inspection Report 50-341/83-30

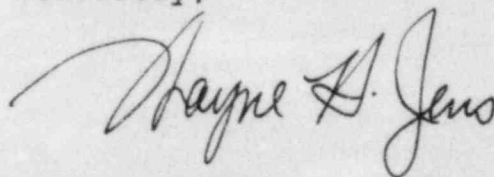
This letter responds to the items of noncompliance described in your Inspection Report No. 50-341/83-30. This inspection of the Fermi 2 construction site activities was performed by Messrs. P. M. Byron and M. E. Parker on December 1, 1983 through January 31, 1984.

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 items of noncompliance and the applicable criterion is referenced.

We trust this response will satisfactorily address the noncompliances cited in your report. If you have questions, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,



cc: Mr. P. M. Byron  
Mr. R. C. DeYoung  
Mr. R. C. Knop

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Q PDR

THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

Response to NRC Report No. 50-341/83-30

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

Inspection at: Fermi-2, Newport, Michigan

Inspection Conducted: December 1, 1983 through January 31,  
1984

Response to NRC Inspection Report No. 50-341/83-30

Statement of Noncompliance, 83-30-01, Criterion XI

10CFR50, Appendix B, Criterion XI states, in part, "A test program shall be established to assure that all testing required...is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents..."

DECo Quality Assurance Procedure QAP 12.0.1 states, in part, "A documented test program shall be established and implemented to determine that structures, systems and components have been...installed in compliance with applicable design requirements."

Contrary to the above, preoperational test procedures PRET. E4100.001, High Pressure Coolant Injection System, and PRET. E5100.001, Reactor Core Isolation Cooling System, did not incorporate all valve timing requirements and acceptance limits specified in the Final Safety Analysis Report.

Corrective Action Taken and Results Achieved

Valve timing acceptance criteria specified in the HPCI and RCIC preoperational test procedures PRET. E4100.001 and PRET. E5100.001 respectively, was based on the Master Valve List (MVL) which, in this case, did not agree with the FSAR. Startup Field Reports SFR #2808 (HPCI) and SFR #2885 (RCIC) were written to address discrepancies in valve stroke timing between the FSAR and MVL as well as other documents where known discrepancies exist (G.E. Test Specifications and Technical Specifications). When Engineering resolves these SFRs, the acceptable valve timing criteria will be added to the respective preoperational test procedures using a Test Change Notice, and if necessary the valves will be retested. Also, the corrected values will be incorporated in the appropriate documents as necessary.

Corrective Action Taken to Avoid Further Noncompliance

In December, 1983, Detroit Edison began a concerted effort to review the FSAR for accuracy. This review included verifying valve timing criteria and the consistency of information when it is repeated in multiple sections of the FSAR.

Since then, three FSAR amendments have been submitted and additional amendments are scheduled for issue in April and May. The accuracy review and development of FSAR Change Notices is continuing, to ensure that all discrepancies (e.g., valve timing) are identified and resolved.

Corrective Action Taken to Avoid Further Noncompliance (cont'd)

To address this concern, the Startup Engineer has directed all Lead Startup Test Engineers to review valve timing criteria contained in the FSAR, MVL, GE Test Specifications and Technical Specifications. If a discrepancy is found, Startup will issue an SFR to Engineering for resolution. Pending resolution of an SFR, the preoperational test procedures will reference the value contained in the MVL for the valve timing acceptance criteria. As stated above, when engineering resolves an SFR, the acceptable valve timing criteria will be added to the respective preoperational test procedure using a Test Change Notice, and if necessary the valve will be retested. The corrected value will be incorporated in the appropriate documents as necessary.

The Date When Full Compliance Will be Achieved

Prior to fuel load, Edison will have reviewed all valve timing criteria and verified that the preoperational test results are acceptable with regards to any revised criteria. Where necessary, the pertinent documents will be revised to reflect the new timing criteria consistent with the schedule presented above.



Response to NRC Inspection Report No. 50-341/83-30

Statement of Noncompliance, 83-30-02, Criterion VI

10CFR50, Appendix B, Criterion VI, and the DECo Quality Assurance Manual, Section 5.0.1, state in part:

"Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy..."

Contrary to the above, Test Change Notice (TCN) 1386, to the High Pressure Coolant Injection System test procedure, was not reviewed for completeness and adequacy. As a result, TCN 1386 did not verify the valve logic sequence.

Corrective Action Taken and Results Achieved

As stated in the inspection report, the Startup Test Engineer (STE) made a "per telecon" Test Change Notice (TCN #1386) to change the step in the preoperational test procedure. When TCN #1386 was performed, the valve again did not operate as required by the test procedure because the logic sequence was still not met. Subsequently, testing was stopped and a Test Exception Disposition Report (TEDR) #22 was written to disposition and resolve the problem. The TEDR disposition was to issue TCN #1389 to correct the procedural deficiency, and to issue a Supplemental Test Form (STF) 15 to reverifiy the prerequisites. Testing was subsequently performed with no problem.

Corrective Action Taken to Avoid Further Noncompliance

Startup has subsequently revised the Test Change Notice procedure (S.I. 4.5.1.01, Rev. 7) by redefining what constitutes a major and minor TCN. A minor TCN is defined as a change that does not alter the functional intent of the procedure or change the acceptance criteria, including typographical errors to acceptance criteria. A minor TCN will now require the Nuclear Shift Supervisor's and a Level III Engineer's approval signature prior to implementing the change and continuing testing. The Test Change Notices addressed above would fall into this category and would have required a review and approval by the above individuals which have ready access to prints/drawings for the logic sequence. This review by the two designated individuals independent of the STE should preclude further instances of this noncompliance.

Response to NRC Inspection Report No. 50-341/83-30

Corrective Action Taken to Avoid Further Noncompliance (cont'd)

In addition, a major Test Change is defined as a change to the functional intent or acceptance criteria. A major TCN will necessitate stopping the test until it has been reviewed and approved by the reviewers specified in Figure 4.2 of the Startup Manual.

The Date When Full Compliance Will be Achieved

S.I. 4.5.1.01, Revision 7, was approved on March 3, 1984. Detroit Edison is in compliance.

Statement of Noncompliance, 83-30-03, Criterion XIII

10CFR50, Appendix B, Criterion XIII, states in part:  
"Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

The Detroit Edison QA Manual states that the program complies with the intent of Regulatory Guide 1.38, which endorses ANSI N45.2-1972. 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.

Contrary to the above, the inspectors observed the following discrepancies in the storage and handling of safety-related materials:

- a. Division 1 and 2 and balance-of-plant cables and hangers were observed in the second floor mezzanine cable spreading room on December 1, 1983, without means of identifying status. The material was adjacent to storage areas designated "QA Level I" and "Scrap".
- b. A coil of division 1 cable and several reels of associated cable were observed in a storage area marked both "QA Level I" and "QA Level 2" on January 24, 1984, without means of identifying status.

Corrective Action Taken and Results Achieved

When the above cases were brought to the company's attention, Detroit Edison responded by promptly removing the material and/or tagged the material to identify its status.

Corrective Action Taken to Avoid Further Noncompliance

Revision 1 to Project Procedures PPM 7.27 "Project Housekeeping" and PPM 7.38 "Storage and Handling of Materials During Construction" were approved and issued January 30, 1984, to provide corrective action. These procedures were revised to describe the requirement for temporary in-process storage and handling of construction materials and for tagging material to identify its status. The procedures specify that material is not to be left unattended (i.e. at end of shift), but rather is to be properly stored and

Corrective Action Taken to Avoid Further Noncompliance (cont'd)

identified . Contractors are responsible for establishing temporary in-process storage or staging areas which identifies the quality level of the area. Also, materials are to be tagged to identify their status including quality level. The appropriate site contractors and Detroit Edison personnel have received training on these procedures during the period January through March 1984.

To ensure implementation of the identified corrective action, Detroit Edison has established a group of monitors, within the Plant Completion Organization (PCO), who monitor the plant on a daily basis. Procedure 13.1 "Surveillance Coordination" approved and issued January 26, 1984, describes the responsibilities of these PCO monitors. Each monitor is assigned an area of the plant to make daily inspection tours and is required to submit daily inspection reports. This includes the monitoring of in-process storage areas as well as tagging of material. The Nuclear Quality Assurance Department follows-up to ensure that identified discrepancies in material control or housekeeping are corrected in a timely manner.

The Date When Full Compliance will be Achieved

The identified procedure changes and training have been completed. However, the actions Detroit Edison is taking to control material are ongoing.