

**Detroit
Edison**

Wayne H. Jens
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May 12, 1984
EF2-68174

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Letter, B. J. Youngblood to H. Tauber,
January 17, 1984

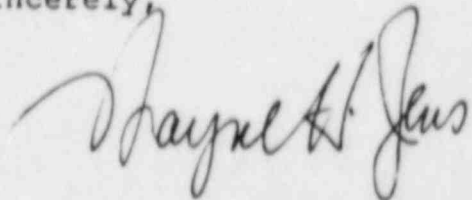
Subject: Independent Safety Engineering Activities

Reference (2) requested Detroit Edison to revise the Fermi 2 FSAR to describe the Independent Safety Engineering Activities. In response to Reference (2), both FSAR Section 13.4.3.3 and the response to Item H.I.B.1.2.3 in Appendix H will be revised in a forthcoming amendment. Attachment 1 provides a copy of the proposed revision for NRC review. Attachment 3 provides the Nuclear Operations Directive (NOD-29) which addresses the Independent Safety Engineering Activities.

Reference (2) also requested a copy of procedure NE 1.3, "Staffing, Training and Qualification of Personnel." Revision 3 of this procedure is provided as Attachment 2.

If you have any questions concerning this matter please contact Mr. O. Keener Earle, (313) 586-4211.

Sincerely,



cc: Mr. R. A. Benedict
Mr. P. M. Byron
Mr. M. D. Lynch
USNRC, Document Control Desk
Washington, D.C. 20555

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ATTACHMENT 1

13.4.3.3 Independent Safety Engineering Activities

The implementation of the Independent Safety Engineering activities is in accordance with Nuclear Operations Directives and is performed under the authority of the Director of Nuclear Engineering. Nuclear Safety and Plant Engineering (NSPE), a part of Nuclear Engineering, provides a lead engineer who is responsible for the performance of the Independent Safety Engineering activities. The lead engineer has a minimum of five (5) years nuclear experience and demonstrated management and leadership capabilities. The Director of Nuclear Engineering provides personnel with the appropriate engineering expertise delineated below to assist the lead engineer in conducting the activities defined below on a schedule which meets the Independent Safety Engineering requirements. This support is equivalent to five (5) engineers inclusive of the lead Independent Safety Engineer. These engineers possess the ability acquired through their working experience, both in their degreed field and area of expertise, to effectively and expeditiously conduct reviews and activities. They are located at the site and are available and in close proximity to the operating personnel, and have continual access to the plant facilities and records.

Minimum qualifications for the engineers assigned to perform the Independent Safety Engineering activities will include the following:

- a. Education: Bachelor's degree in engineering or a related science. The personnel assigned will have a varied background to cover the field of mathematics, reactor physics, chemistry, materials, reactor thermodynamics, fluid mechanics, heat transfer, and electrical and reactor control theory.
- b. Experience: Two years of related professional-level experience.
- c. Training: Knowledge in the details of design, function, arrangement, and operation of the plant systems, control room instruments, and control functions.

Additional support from sources other than Nuclear Safety and Plant Engineering will be utilized in special circumstances when the lead Independent Safety Engineer, with the concurrence of the Director of Nuclear Engineering, deems it necessary. Those persons will have a Bachelor's Degree in Engineering or a related science and two (2) years of related professional-level experience in their respective fields of expertise to conduct the assignment as it applies to Fermi 2.

The lead Independent Safety Engineer reports administratively to the Supervisor - Safety and Performance Analysis and functionally to the Director of Nuclear Engineering. The Director of Nuclear Engineering is not in the direct management chain for power production; he is independent of the Plant Superintendent.

The lead engineer and those assisting him perform independent safety engineering reviews of plant activities, including maintenance, modifications, operational problems and operational analyses. In addition, they examine plant operating characteristics, NRC issuances, Licensee Event Reports, and other sources that may indicate areas for improving plant safety. They also aid in the establishment of programmatic requirements for plant activities.

In addition, the lead engineer and those assisting him survey plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as much as practicable. They do not perform detailed audits of plant operations and are not responsible for signoff functions to the extent that they become involved in the operating organization. Other Independent Safety Engineering activities include recommending procedure revisions, equipment modifications, and other means of improving plant safety to the Director of Nuclear Engineering.

As required or warranted, the lead Independent Safety Engineer or any assigned engineer verbally reports any significant conditions or concerns to the Director of Nuclear Engineering. This verbal report is followed by a written report.

The lead Independent Safety Engineer pursues investigations of areas or activities that he considers appropriate for or important to safe plant operations, subject only to the direction of the Director of Nuclear Engineering. The lead Independent Safety Engineer issues a periodic report of the Independent Safety Engineering activities to the Director of Nuclear Engineering.

H.I.B.1.2.3 Detroit Edison Position

Refer to Section 13.4.3.3 for a discussion of staffing and scope of responsibilities of the Fermi 2 Independent Safety Engineering Program.