

Detroit  
Edison

Douglas R. Gipson  
Senior Vice President  
Nuclear Generation

Fermi 2  
6400 North Dixie Highway  
Newport, Michigan 48166  
(313) 586-5249

June 2, 1995  
NRC-95-0054

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 50-341/95004  
dated May 4, 1995
- 3) NRC Inspection Report 50-341/92018  
dated January 8, 1993
- 4) NUREG-1525 dated April, 1995

Subject: Reply to Notice of Violation 95004-03

Enclosed is the reply to the Notice of Violation (NOV) contained in Reference 2. The severity level of this violation should be recognized as severity level 5, based on the minor safety significance of this problem as discussed in the attached response. The deficiency found in the emergency support procedure has minor safety significance because although the continuous operability temperature for the HPCI room is 122°F, the environmental qualification design temperature would not be exceeded due to restoration of Reactor Building Closed Cooling Water to the drywell.

In addition, it is Detroit Edison's belief that this violation meets the elements of 10CFR2, Appendix C VII.B.(1) for a severity level 5 non-cited violation as further discussed in NUREG 1525. The elements described by Appendix C VII. B.(1) are satisfied because:

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- 1) This problem has a minor safety significance.
- 2) It is not a violation that could have reasonably been expected to have been prevented by the corrective actions for previous violations. NRC Inspection Report 95004 text, item 3.5.1.3 states, in part:

"Detroit Edison had assumed that existing procedures were technically correct, even though the NRC identified programmatic weaknesses in the verification process during a November 1992 inspection."

The programmatic weaknesses that were identified in 1992 did not include technically inadequate flowcharts or support procedures. Reference 3 concluded that in general, the Fermi EOP's, including support procedures were technically correct and identified no technical deficiencies. Therefore, Detroit Edison's focus for the improvements to the EOPs and support procedures following 1992 centered around human factors problems and Validation and Verification (V&V) for human factors.

- 3) Corrective action for the problem was taken before the end of the inspection, as described in section 3.5.1.3 of reference 2.

With respect to instrument rack leakage, the cover letter of Inspection Report 95004 states, in part:

"In addition, management's failure to implement corrective actions to the instrument rack leakage while the plant was in a condition conducive to such repairs indicated poor internal communications and inadequately prioritizing work."

Detroit Edison disagrees with the general characterization in the cover letter, and the accuracy of the statement in the text of the Inspection Report. As previously discussed with the NRC Senior Resident Inspector, we recognize that for this single example, additional action could have been taken to identify and repair the leaking valve. However, we disagree that our decision indicated poor internal communication or inadequate prioritization of work. Also, we believe, in general, that our performance in the area of leakage control is very good, as evidenced by a number of objective measures such as the number of contaminations. During the May 1995 Regulatory Information Conference the purpose of sending messages in the inspection report cover letters was discussed

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in the Region III session. It was stated that the cover letter is used when there is a need to send a strong message to the licensee. We believe that selecting this example for discussion in your letter is inappropriate because this example is not representative of our performance in the area of leakage control, and there was no need for a strong message to be sent.

Further Inspection Report 95004 text section 6.1.2 states, in part:

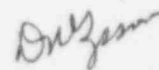
"Management was not aware that a 10 - 30 dpm leak was previously identified on the same instrument rack in January, 1995."

The 10 to 30 dpm leak identified in January, 1995 was not from H21-P010 as indicated in the inspection report. Instrument rack H21-P022 had a 10 to 30 dpm identified in January, 1995.

The discussion of the results of the emergency preparedness inspection in the report, especially in the summary section, did not fully reflect what we heard in the exit meeting. The exit meeting results seemed significantly more positive than described in the inspection report summary section. This is of concern to us for two reasons. The first reason is that the public reads the inspection report and is not privy to the exit meeting discussions. The second reason is that the new Integrated Performance Assessment Process (IPAP) is based in part on the docketed inspection reports. If the results are not properly characterized they will affect the IPAP results.

If you should have any questions related to this response, please contact Joseph M. Pendergast, Compliance Engineer, at (313) 586-1682.

Sincerely,



Enclosure

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

Reply to Notice of Violation 50-341/95004-03

Statement of Notice of Violation 95-004-03:

10 CFR 50, Appendix B, Criterion III, requires, in part, that measures be established to assure that the design basis is correctly translated into procedures. Design Calculation 5148, "EOP Guidelines for Restoration of Drywell Cooling," Revision 0, formed the design basis for procedure 29.ESP.08, "Drywell Cooling Water Restoration," Revision 1. Design Calculation 5148 required monitoring the high pressure coolant injection (HPCI) room temperature for restoration of the reactor building closed cooling water system.

Contrary to the above, as of February 28, 1995, the design basis for restoration of drywell cooling water was not correctly translated into Procedure 29.ESP.08, Revision 1, in that the procedure did not require monitoring of the HPCI room temperature for restoration of reactor building closed cooling water.

Reason for the Violation:

Procedure 29.ESP.08, "Restoration of Drywell Cooling", provides instructions for restoring cooling water to the drywell to help control the drywell temperatures when directed by the Emergency Operating Procedure (EOP) flowcharts. The Primary Containment Control flowchart directs that this Emergency Support Procedure (ESP) be utilized when Drywell temperature exceeds 145° F.

The procedure has three sections:

- 1) Restoration of Reactor Building Closed Cooling Water (RBCCW) to the Drywell
- 2) Restoration of RBCCW to One Division and Emergency Equipment Cooling Water (EECW) to the Other Division of Drywell Cooling Water
- 3) Restoration of EECW to the Drywell.

The first two sections of the procedure is where the problem existed.

The reason for the violation is that when restoration of drywell cooling was added to NPP-29.000.02, Revision 12 in August, 1990 monitoring of the HPCI room temperature was not incorporated into the procedure. In 1993 Detroit Edison initiated a human factors upgrade of the EOPs. This resulted in creation of 29.ESP.08 for restoration of drywell cooling in 1994. This procedure was not reviewed for technical content by engineering because the contents of this

procedure had been extracted from previously approved procedures. Therefore the initial errors made in 1990 were carried forward.

Corrective Steps Taken and Results Achieved:

When the inconsistency in the drywell cooling water restoration support procedure was identified by the NRC, the procedure was corrected.

Engineering evaluated the HPCI room temperature response following restoration of RBCCW to the drywell. This evaluation determined that HPCI room temperature would not exceed the environmental qualification design limit, resulting in no significant impact on the operation of the HPCI System.

Corrective Steps to Avoid Further Violations:

One of the actions taken by Detroit Edison, following the NRC inspection of EOPs in 1992, was to revise the V&V administrative controls to obtain an engineering review of any technical changes to the EOPs. Prior to that time engineering did not review EOP revisions. Prior to the 1995 NRC inspection, the engineering department had performed a review on 19 of the 26 Emergency Support Procedures. The remaining seven support procedures including 29.ESP.08, had not had their technical content revised (thus engineering review of these procedures had not been performed).

To identify any additional problems, all seven support procedures that had not been reviewed by engineering prior to 1995 have received an engineering review, and no additional technical deficiencies were identified. Comments for enhancement of the support procedures (i.e., clarification on sources of water to sumps, additional information for ventilation flow paths and leakage locations cross reference) were provided to the operations support staff for evaluation.

Date When Full Compliance Will Be Achieved:

Detroit Edison is in full compliance.