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NRC-95-0068

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 50-341/94011,
dated September 16, 1994
 - 3) Detroit Edison Letter NRC-94-0083,
dated October 17, 1994

Subject: Revised Response to Notice of Violation 94011-01

Enclosed is a revision to Detroit Edison's response (Reference 3) to the Notice of Violation contained in Reference 2. This revision is being submitted to clarify the information previously provided in the "Reason for the Violation" portion of Detroit Edison's response. No new commitments are being made in this letter.

If there are any questions related to this response, please contact Ken Riches, Compliance Engineer, at (313) 586-5529.

Sincerely,

Robert McKeon

Enclosure

cc: T. G. Colburn
H. Miller
M. P. Phillips
A. Vogel
Region III

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PDR ADDCK 05000341
Q PDR

TEA

Reply to Notice of Violation 50-341/94011-01

Statement of Notice of Violation 94011-01

"Technical Specification 6.8.1.d. requires that written procedures shall be established, implemented, and maintained covering the surveillance and test activities of safety-related equipment. Attachment 2 of Surveillance Procedure NPP-43.401.404, "Local Leakage Rate Testing for Penetration X-201A", requires in part, that Valve E11-F018D be restored to a "Locked Open" position.

Contrary to the above, on August 22, 1994, the NRC inspector determined that Residual Heat Removal (RHR) pump "D" recirculation isolation valve E11-F018D had not been locked in the open position in accordance with the restoration specified in Surveillance Procedure NPP-43.401.404."

Reason for the Violation

This violation occurred because training with respect to locked valve verification was not effective. Several operators performed separate checks of this valve between July 23 and August 8, 1994, none of them identifying that the valve was improperly locked. E11-F018D is a rising stem gate valve. The locking chain was threaded through the handwheel and was locked, but the free end of the chain was not secured to the valve. Operators believed that verifying valve position by visual observation of the valve stem in the "up" position with the chain and the lock installed was acceptable. This method of verification did not meet requirements regarding the need to perform "hands-on" verification of valve position and locked condition of locked valves as described in the procedures for Independent Verification, Locked Valve Guidelines and Locked Valve Lineup Verification. This event is believed to be a training issue rather than a series of individual performance problems because of the number of operators involved in using the inappropriate visual locked valve verification method.

Corrective Actions Taken and the Results Achieved

The locking discrepancy on E11-F018D was immediately corrected when identified on August 22, 1994. In order to provide assurance that this was an isolated problem, locked valve verifications were performed on the following systems (outside containment): Standby Liquid Control (C41), Residual Heat Removal (E11), Core Spray (E21), High Pressure Coolant Injection (E41), Emergency Equipment Cooling Water (P44), Emergency Equipment Service Water (P45), Compressed Air (P50), Standby Emergency Diesel Generator (R30), Standby Gas Treatment (T46) and Hydrogen Recombiners (T4804). The personnel performing these verifications were instructed to perform a "hands-on" positive check to ensure that locking devices were installed and secure. No additional problems were identified.

Corrective Actions To Be Taken To Prevent Recurrence

Procedural requirements for Independent Verification and Locked Valve Verification, along with a clear statement of management's expectations with regard to these activities, has been presented in Cycle 7 Licensed Operator Requalification training for both licensed and non-licensed operators. This training included a "hands-on" demonstration of locked valve positioning and verification techniques. In the interim, operators performing locked valve verifications were briefed by shift supervision on this event and on the proper method for performing locked valve verifications. These briefings were completed prior to plant startup.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 22, 1994 when the locking chain on E11-F018D was secured to the valve and the valve was properly verified to be in the locked open position.