

**Detroit  
Edison**

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September 27, 1984  
EF2-69717

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

Dear Mr. Keppler:

Reference: Fermi 2  
NRC Docket No. 50-341

Subject: Detroit Edison Response  
Inspection Report 50-341/84-29

This letter responds to the items of noncompliance described in your Inspection Report No. 50-341/84-29. This inspection was performed by Messrs. R. C. Martin, S. G. DuPont and G. O'Dwyer, and Ms. P. L. Eng on July 16 through August 17, 1984.

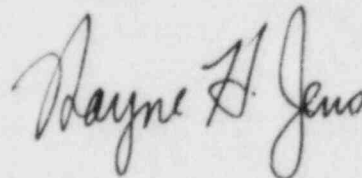
The items of noncompliance are discussed in this reply as required by Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

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 letter will satisfactorily respond to the noncompliances cited in your report. If you have questions regarding this matter, please contact Mr. Lewis Bregni, (313) 586-5083.

Sincerely,

cc: Mr. P. M. Byron  
Mr. S. G. DuPont  
Mr. R. C. Knop



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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC REPORT NO. 50-341/84-29

DOCKET NO. 50-341      LICENSE NO. CPPR-87

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: JULY 16 THROUGH AUGUST 17, 1984

Statement of Noncompliance 84-29-01, Criterion V

10 CFR 50, Appendix B, Criterion V as implemented by DECo Quality Assurance Manual, Section 9.0.1 requires that activities affecting quality shall be accomplished in accordance with procedures.

Contrary to the above, during preoperational testing certain activities were not accomplished in accordance with procedures. This is evidenced by the following occurrences:

- a. While establishing initial conditions for R3000.003, Emergency Diesel Generator Load Profile Test and Load Sequencing, test equipment needed to obtain acceptance criteria data was not electrically connected as required by the procedure.
- b. During performance of R3000.003, test personnel did not operate switches in the manner specified in the procedure causing the "C" core spray pump to be delayed in starting during the test.
- c. While establishing initial conditions for R1102.001 Emergency Safeguards System Auxiliary Electrical System an electrical breaker was not placed in the open position as required by the procedure.

Each of these occurrences required retesting to be performed for the affected sections of the respective preoperational tests.

Corrective Action Taken and Results Achieved

This item involves three examples of failure to follow approved procedures due to personnel error.

Two of these examples occurred during R3000.003, EDG Load Profile and Load Sequencing Preoperational Test. The other example occurred during R1102.001, ESF Auxiliary Electrical System Preoperation Test.

In each instance, the personnel involved in the error were instructed on the specific cause and significance of their error. The importance of exact procedural compliance and attention to detail were emphasized.

Additionally, the initial conditions for each test were re-established in accordance with the appropriate test procedure and the tests were repeated successfully.

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-29

Corrective Action Taken to Avoid Further Noncompliance

Each of these examples was discussed at the Startup Group weekly staff meeting. This discussion included the details of the event and the possible causes for each type of personnel error. Strict compliance with procedures and attention to detail were identified as essential to personnel and equipment safety and to assure the validity of the test results.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Statement of Noncompliance 84-29-02, Criterion V

10 CFR 50, Appendix B, Criterion V and ANSI N18.7-1976, Section 5.3, as implemented by DECo Quality Assurance Manual, Section 9.0.1, requires that activities affecting quality shall be prescribed by appropriate written instructions, procedures, or drawings, and accomplished in accordance with these documents.

Contrary to the above, preventative maintenance activities to clean the Emergency Diesel Generator 14 Lube Oil Filter and corrective maintenance activities on a Residual Heat Removal System Valve were not performed by appropriate, approved, written procedures.

Corrective Action Taken and Results Achieved

Personnel responsible for the preparation and approval of these work orders had assumed that these maintenance items were within the capability of the craft. This assumption was based on their knowledge of General Maintenance Journeyman job descriptions and the existing training programs. The individual preparing the lube oil filter package did not adequately review existing procedures for this maintenance item. The individual preparing the package affecting the Residual Heat Removal (RHR) system valve did not recognize that the electrical disconnection and removal of the Limitorque operator warranted the use of an approved procedure. In each case, craftsmen were provided handwritten instructions on the "Attachment A" to the work order.

The immediate corrective action consisted of the following:

- o Work orders were initiated for EDG No. 13 and No. 14 to verify that the lube oil cartridges are installed in accordance with POM 34.000.14, "Emergency Diesel Generator Inspection."
- o The QC inspections which were part of the original work order verified that the affected RHR system Limitorque valve operator was properly installed.

Corrective Action Taken to Avoid Further Noncompliance

To avoid recurrence of the specific problem with changing the EDG lube oil filters, the computerized preventative maintenance program sheet will be revised to reference Maintenance Instruction M-136 "Emergency Diesel Generator-Preventive Maintenance". This instruction was revised to incorporate the requirements of POM 34.000.14.

To avoid recurrence of the specific problem with the removal of Limitorque valve operators, a new Maintenance Instruction MI-M328, "Limitorque Installation and Removal," has been written for the removal and installation of Limitorque valve operators. This instruction will be included in the appropriate future work orders. Personnel responsible for the preparation of work orders have been instructed to include Maintenance Instruction M-047, "Motor and Generator Terminators," as part of work orders which involve motor and generator determinations or reterminations.

Administrative Procedure 12.000.15, provides guidance for the use of procedures for routine and non-routine maintenance. Personnel involved in the preparation of maintenance work orders have been advised of the details of this noncompliance and cautioned against writing maintenance instructions without first thoroughly reviewing existing instructions and procedures. Additionally, these individuals have been alerted to the need to identify tasks where OSRO approved procedures may be appropriate.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by October 1, 1984.