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July 24, 1984
EF2-69661

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

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341
(2) Letter, W. H. Jens to R. L. Spessard,
February 6, 1984, EF2-67208
Subject: Noncompliance at Fermi 2
Inspection Report 50-341/84-11

This letter responds to the items of noncompliance described in your Inspection Report No. 50-341/84-11. This inspection of the Fermi 2 preoperational test activities was performed by Messrs. S. G. DuPont and R. C. Martin on April 16 through June 1, 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 are referenced.

We trust this letter satisfactorily answers the concerns raised in your report. If you have questions regarding this matter, 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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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

Response to NRC Report No. 50-341/84-11

Docket No. 50-341

License No. CPPR-87

Inspection at: Fermi 2, Newport, Michigan

Inspection Conducted: April 16, 1984 through June 1, 1984

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-11

Statement of Noncompliance, 84-11-01, 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 be prescribed by appropriate written instructions and procedures.

Contrary to the above, preoperational test procedure R3202.001 24/48 VDC System was not appropriate in that it did not require connecting the battery chargers to the 24/48 VDC system prior to the conduct of the battery charger performance test. This condition existed for both the Division I and Division II battery tests.

Corrective Action Taken and Results Achieved

Test Change Notice (TCN) 1722 was issued to PRET. R3202.001, Rev. 1 to reconnect the battery chargers prior to the performance test. This test change allows the test procedure to meet the stated test objectives.

Corrective Action Taken to Avoid Further Noncompliance

The inspection report cover page requested the following, with regards to the technical review process during the preoperational test phase: "In your response to item 1, please include a detailed description of the actions you plan to take to improve the technical review process during the preoperational test phase. These actions must address reviews for preoperational tests, test change notices and test results."

Detroit Edison has taken steps to improve the preoperational test program with respect to technical reviews. The technical review emphasis for the startup program is to ensure the procedures and results meet the test objectives. Startup Instructions have been revised to designate each reviewing organization's responsibilities during the review of test procedures, Test Change Notices and test results. Test procedures are prepared and reviewed in accordance with Startup Instruction 8.4.2.01, PREOP/ACPT Procedure Preparation. This instruction defines the requirements for preparation and the requirements for review of test procedures. To improve the Preoperational Test Programs, the following additional steps are being taken:

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The Startup Test Engineer (STE) is responsible to ensure that the step-by-step instructions are complete and meet the test objectives.

The STE will review the procedure at several stages during preparation to ensure incorporation of updated material and to ensure that procedural steps that are identical for one or more sections of the procedure test comparable components in the different divisions or channels.

All reviewing organizations will develop checklists to be used during their reviews. These checklists will be submitted to the Startup Administrative Coordinator with the procedural comment control forms and will be retained until the Startup Organization is dissolved.

Major Test Change Notices will also utilize checklists and all reviewers must submit these checklists with the comment control forms. The checklists will be retained as above. Startup Instruction 4.5.1.01, Administrative Controls of Startup Originated Procedures and Test Change Notices, is being revised accordingly.

Startup Instruction 8.4.2.05, Test Results Package Preparation/Review, is being revised as follows to strengthen the review of test results.

The STE will document test results in a clear, concise and accurate manner in order to provide an audit trail of the test.

The LSTE is responsible for ensuring that the following documents are properly addressed:

1. Design drawings and associated open design changes,
2. IE bulletins, circulars and notices, and
3. Nuclear plant experience reports.

The LSTE reviews and approves preoperational test results.

Checklists will be developed and utilized as discussed above during the review of the test results package.

Additional related information was provided in our previous letter, dated February 6, 1984, Mr. W. H. Jens to Mr. R. L. Spessard, in response to inspection report 50-341/83-21.

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Date When Full Compliance Will be Achieved

Action has been completed to correct the specific item of noncompliance. The necessary documents and checklists described in the above text to avoid further noncompliance will be developed by August 15, 1984.

Statement of Noncompliance, 84-11-06, 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 instructions; Startup Instruction 4.7.0.01, Section 5.1.8, requires that PN-21s are reviewed to determine impact on other systems or tests, need and placement for additional protective tagging, and coordination of work and testing schedules.

Contrary to the above, testing conditions required by PN-21 were not accomplished as instructed and were not reviewed to determine impact on R3000.001 EDG System with the service water reservoir at or below the minimum submergence level, resulting in the operation of the DGSW "D" pump below the minimum submergence.

Corrective Action Taken and Results Achieved

The RHR Complex Service Water System reservoir level was re-established and testing of the pumps was accomplished to determine operability and if any damage had resulted during operation with reservoir level below minimum submergence. Nonconformance Report (NCR) 84-0638 was initiated on April 28, 1984, and documents the testing results. In addition to this NCR, Nuclear Operations initiated a Deviation/Event Report (DER) NP-84-029, on April 30, 1984. This DER addressed the root cause of the deviation. All pumps were found to operate satisfactorily.

Corrective Action Taken to Avoid Further Noncompliance

The following actions have been taken to avoid further noncompliance.

1. Responsible individuals were counseled by management. In addition, several Operations and Startup personnel received disciplinary action.
2. Deviation/Event Report (DER) NP-84-029 describing this event was placed in Operator required reading for licensed and unlicensed Operators.
3. An entry was made in the night order book to increase the frequency of checking fluid levels, especially when dynamic changes (pumping or draining) are taking place, for any tank, vessel or reservoir out of its normal indicated range.

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4. Shift briefing times have been established prior to the start of testing.
5. The Nuclear Shift Supervisor or his assistant (NSS/NASS) has the authority to demand pre-test briefings as necessary.

Detroit Edison is of the opinion that the above actions provide assurance that testing coordination has improved and that the increasing test activities will be coordinated to preclude further instances of this noncompliance.

Date When Full Compliance Will Be Achieved

With the exception of completion of required reading by Operators, full compliance has been achieved. The required reading for Operators will be completed by August 15, 1984.