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August 27, 1984  
EF2-69701

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

Dear Mr. Keppler:

Reference: (1) Fermi 2  
NRC Docket No. 50-341  
(2) Letter, D. A. Wells to J. G. Keppler,  
April 20, 1983, EF2-62623  
Subject: Amended Report of 10CFR50.55(e) Item 88  
"Questionable Qualification of Certain  
L. K. Comstock Q. C. Personnel."

This letter amends Detroit Edison's final report of Item 88, "Questionable Qualifications of Certain L. K. Comstock Company Q. C. Personnel." Item 88 was originally reported as a potential deficiency on March 11, 1983, and was documented in a final report (Reference 2) which indicated Detroit Edison does not consider this item reportable under 10CFR50.55(e).

A change in the certifications of twenty-four inspection personnel had resulted in those individuals being declared unqualified for the work they had been performing. This letter is written to clarify the number of inspections involved and the amount of reinspection performed.

Detroit Edison's Project Quality Assurance (PQA) Department conducted a review of the certification files to determine if there was evidence to substantiate the initial levels of certification. Four of the twenty-four individuals were in training and had not performed any inspections. One of the twenty-four was not certified to inspect anything and had not signed off a permanent plant document. Of the remaining nineteen, the PQA review identified four individuals whose ability to meet ANSI N45.2.6 Level 1 qualification requirements was questionable based on the available documentation.

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The L. K. Comstock Company then conducted a minimum 30% sample reinspection of the hardware inspected by the four individuals. Their results revealed that all sampled inspections were properly conducted and documented. The remaining fifteen individuals plus the four individuals whose work was 30% sampled/inspected had 25% of their documentation checked. The L. K. Comstock Company results revealed that all sampled inspections were properly conducted and documented.

Summary of Data

4	In training, performed no inspections
1	Did not perform any inspections
4	Questionable qualifications - 30% reinspection of hardware performed, plus 25% of documentation reviewed.
15	Qualifications complied with ANSI N45.2.6 - 25% of documentation was reviewed.
<hr/> 24	Total

The corrective action taken was to rewrite resumes as necessary to provide greater detail in the area of prior work experience.

If you have questions concerning 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

