

**Detroit  
Edison**

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January 29, 1985  
EF2-70230

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

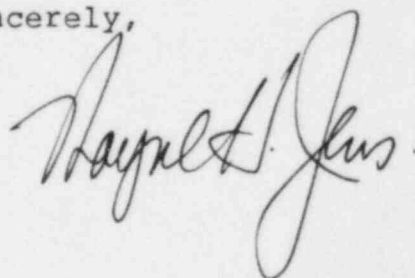
Subject: Detroit Edison Response  
Inspection Report 50-341/84-50

The attached report responds to the item of noncompliance described in your Inspection Report No. 50-341/84-50. This inspection was conducted by Messrs. R. Mendez, Z. Falevits and A. Gautam of NRC Region III on October 23-26, 1984.

The item of noncompliance is 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 appropriate criterion and the number identifying the item are referenced.

We trust this letter satisfactorily responds to the item of noncompliance cited in the inspection report. If you have questions regarding this matter, please contact Mr. Lewis Bregni, (313) 586-5083.

Sincerely,



cc: P. M. Byron  
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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

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

DOCKET NO. 50-341

LICENSE NO. CPPR-87

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: October 23-26, 1984

Statement of Noncompliance 84-50-01

10 CFR 50, Appendix B, Criterion VI, as implemented by DECo Quality Assurance Manual Section 5.0.1, requires that measures be taken to assure that documents, including changes, are reviewed for adequacy.

Contrary to the above, Detroit Edison Company failed to assure that the "as built" general arrangement drawings 6I721-2281-19, Revision J and 6I721-2281-5, Revision H, reflected as built conditions for instrument racks H21-P021 and H21-P005 respectively in the following areas:

Twelve discrepancies were identified between catalog numbers and quantities of items listed on the as-built drawings and the installed items as reviewed in the field. For example, item 106, "Calibration Valve", was listed on drawing 6I721-2281-19 Revision J, as catalog number 670-5-5-63, while the same item observed in the field was found to be inscribed with catalog number 670N5563M.

Eight discrepancies were found in the identification of instruments, valves and tubing indicated on the as-built drawings and the actual identification of these items in the field. For example, drawing 6I721-2281-19 Revision J, did not indicate the location of item 416 on rack H21-P021, nor did it list the name tag information for this item. This item was found installed in the instrument rack.

Six discrepancies were identified in tubing locations and connections shown on the as-built drawing and the actual installation in the field. For example, tubing line "A6" was shown entering rack H21-P021 on drawing 6I721-2281-19 Revision J, even though this line had been deleted in the field.

Seven discrepancies were identified in the instrument locations shown on the as-built drawings and field instrument locations reviewed in the field. For example, a quantity of four (4) item 117, "quick connects", listed as installed parts on drawing 6I721-2281-19 Revision J, for rack H21-P021, were found removed from the rack in the field.

Corrective Action Taken and Results Achieved

A drawing verification program for QA Level I General Electric instrument racks has been completed. This program identified, documented, and evaluated discrepancies between the as-built racks and the associated drawings. These discrepancies, including those identified by the NRC inspector, are being dispositioned on nonconformance reporting documents. Drawings are being updated or hardware changes are being made as appropriate.

Corrective Action Taken to Avoid Further Noncompliance

Detroit Edison has undertaken a program for the verification of QA Level I design documents. This program, to be described in response to 10CFR50.55(e) Item 143, will assure that Fermi 2 design documents are adequate for plant operation and maintenance.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved in accordance with the program in response to 10CFR50.55(e) Item 143.