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December 30, 1992
NRC-92-0138

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Reference: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) NRC inspection Report 92-016,
dated November 30, 1992

Subject: Response to Unresolved Items 92016-01 and 02

Enclosed is Detroit Edison's response to Unresolved Items (URI) 92016-01 and 92016-02. URI 92016-01 concerns the review of a safety related procedure. URI 92016-02 concerns the implementation of a procedure to trend the performance of safety related instruments that have consistently failed to meet Detroit Edison specified as-found acceptance criteria.

If you have any questions, please contact Barbara Siemasz at (313) 586-1683.

Sincerely,

Enclosure

cc: T. G. Colburn
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RESPONSE TO UNRESOLVED ITEMS 92016-01 AND 92016-02

The cover letter for Reference 2 requested that Detroit Edison provide the results of a review regarding two Unresolved Items (URI), 92016-01 and 92016-02, and any specific actions taken. URI 92016-01 pertains to the review of a safety related procedure and URI 92016-02 pertains to the implementation of a procedure to trend the performance of safety related instruments which consistently failed to meet Detroit Edison specified as-found acceptance criteria. Detroit Edison's response to both URIs is discussed under separate headings in the following text.

Unresolved Item 92016-01:

On October 28, 1992, during performance of procedure 44.010.167, "Flow Unit D Calibration", the Instrument and Controls (I&C) technicians stopped the test because they could not proceed further due to errors identified in the procedure. Investigation by Detroit Edison personnel found that these same errors were identified when Section 6.2.6 of the procedure was last performed in April 1991. This section is only performed when the plant is in Operational Modes 4 or 5, i.e., the plant is shutdown. A Deviation Event Report (DER) was written to investigate the cause of the failure to correct the errors in the procedure.

The investigation found that on April 14, 1991, while performing procedure 44.010.167, Revision 25, several errors were identified in the procedure and were subsequently noted on the Surveillance Performance Form (SPF). The SPF is used to initiate surveillances required by Technical Specifications and to document reviews which are required before and after the surveillance is performed. The SPF is also used to document problems encountered during the performance of the surveillance. In this case, the SPF listed the following errors:

- o Step 6.2.6.1 referenced computer point B055 instead of the correct computer point B056.
- o Step 6.2.6.3 referenced computer point B037 instead of the correct computer point B038.
- o Step 6.2.6 (Note), referenced Attachment 3 instead of the correct Attachment 4.
- o Table 3 heading referenced transmitter B31-N024A instead of correct transmitter B31-N024D.
- o Table 4 heading referenced computer point B039 instead of correct computer point B040.

No safety related function was affected by these errors. The proper loop components were tested.

A review of Revision 24 of this procedure was performed and found none of the aforementioned errors. Therefore, it was concluded that the errors were most likely introduced during the document change process

for Revision 25. A review of subsequent revisions to procedure 44.010.167 was conducted. The following is a summary of the results of that review:

On April 13, 1991, Temporary Change Notice (TCN) T07278 was written against Revision 25. (A TCN is a temporary change to a procedure written when a step or steps cannot be performed exactly as stated but the intent is clear and a delay in performing the procedure could affect operation of the plant.) TCN T07278 corrected several procedural errors. These errors were different than the errors cited on the April 14, 1991 SPF. On April 15, 1991, when the I&C Supervisor reviewed the April 14, 1991 SPF, he signed off on the SPF thinking that the errors listed on the SPF had been addressed in TCN T07278.

On April 24, 1991, Revision 26 was approved which incorporated TCN T07278. During this revision, the author noticed the error in the Table 3 heading and a correction was made which changed transmitter B31-N024A to B31-N024D. This change corrected one of the errors cited on the April 14, 1991 SPF.

On April 25, 1991, TCN T07313 was written against Revision 26 to incorporate changes to enhance Attachment 5. TCN T07583 was also written against Revision 26 which changed an instrument model number. On November 21, 1991, Revision 27 was approved which incorporated TCN T07313 and TCN T07583. The computer points, the Table 4 heading and the reference to Attachment 3 errors remained.

On September 10, 1992, Revision 28 was approved which incorporated changes related to the Fermi 2 Power Uprate Program.

During the third refueling outage while performing Revision 28 of procedure 44.010.167, the remainder of the errors from the April 14, 1991 SPF were identified again. These errors were subsequently corrected in TCN 108102.

The root cause of not correcting the errors identified on the April 14, 1991 SPF is personnel error. The author, at the time of revising this procedure (Revision 25), inadvertently used numbers from one of the three other similar procedures which were being revised at the same time. The author and technical reviewer, who are responsible for reviewing new and revised procedures for accuracy, did not adequately review this revision, which allowed the errors to remain in the procedure. A contributing factor is the I&C Supervisor, who is responsible for reviewing the SPFs to ensure comments/problems are resolved, did not perform an adequate review.

The authors and technical reviewers for maintenance procedures have been counseled to more closely proofread changes incorporated into documents. The I&C supervisors have been reminded that a thorough review of the SPF must be performed to ensure all discrepancies will be resolved.

A full review of procedure 44.010.167 for accuracy is underway. TCN T08102 is expected to be incorporated, along with any change as a result of the 44.010.167 review, by January 6, 1993. Procedures 44.010.164, 44.010.165 and 44.010.166, which are similar procedures for testing flow units A, B and C, respectively, will receive a full review and be revised, as necessary. This is expected to be completed by February 1, 1993.

A Quality Assurance Surveillance will be performed on the surveillance procedure change process, which is expected to begin by February 1, 1993.

Unresolved Item 92016-02:

Surveillance setpoint drift trending is performed via procedure NPP-CT1-05, "I&C Surveillance Test Setpoint Trending". Individual Technical Specification related trip units and instrument loops are trended through this procedure.

Functional tests of the testability channels provide quantitative data for trending of the trip units. Procedure NPP-CT1-05 requires that this functional test data be entered by the I&C Supervisor onto the Testability Trend Record form. The I&C Supervisor compares the newly entered data with previously entered data to determine if there is a trend. As currently written, procedure NPP-CT1-05 requires that a Potential Design Change (PDC) be written should accumulated test results indicate possible problems with a trip unit. To strengthen this, procedure NPP-CT1-05 will be revised to include guidance on problem identification. Also, when a problem is identified, a Deviation Event Report (DER) instead of a PDC will be initiated to assess and correct the problem in accordance with the corrective action program.

Loop surveillance test results are reviewed against Technical Specification requirements and the results are recorded by the I&C Supervisor on the Loop Surveillance History/Trend card. The I&C Supervisor compares the newly entered results with previously entered results to determine any adverse trends (e.g., consistently unsatisfactory as-found results). If an adverse trend is identified, the I&C General Supervisor is notified and either the work request, DER or PDC process is initiated to address the problem. The NRC inspector noted that criteria for trending requirements were not specified and therefore left open to interpretation by the maintenance supervisor. Detroit Edison agrees that the criteria and the means for initiating corrective actions should be specifically defined. Therefore, procedure NPP-CT1-05 will be revised to specifically define the number of loop calibration failures that would require the I&C Supervisor to initiate correction action. Procedure NPP-CT1-05 will clearly indicate that a DER, PDC or work request is to be initiated when equipment problems are identified.

The history trend cards are used as a qualitative trend of loop performance. Many surveillances are written with as-found loop tolerances tighter than required by design calculations. Using tighter tolerances helps to ensure that overall instrument accuracy remains within Technical Specification requirements. This process has resulted in instrument loops that seldom exceed Technical Specification requirements as evidenced by the lack of Licensee Event Reports for this type of failure. However, since the as-found loop tolerances are tighter, a greater number of "failures" occur. FMD CT1, "Calibration, Testing and Surveillance", requires that equipment or systems that fail to meet as found acceptance criteria are to be trended in accordance with FMD MA1, "Maintenance". These "failures" are not the result of exceeding design tolerances and as such are not considered equipment failures or malfunctions which would be required to initiate trending per FMD MA1. Detroit Edison agrees that the criteria for initiating trending per NPP-CT1-05 is unclear. Therefore, NPP-CT1-05 will be revised to specifically define the criteria that will be used to initiate the trending requirements of FMD MA1.

In Inspection Report 92016, the NRC inspectors identified trend data that was ambiguous, incomplete and inconsistent with previous data. A specific example was provided to a Detroit Edison licensing representative which was subsequently determined to have been caused by inattention to detail. This action resulted in placing as-left data in the as-found column on the Loop Surveillance History/Trend card. The data was corrected and the responsible supervisory personnel were reminded that it is part of their job performance objectives to perform a thorough review of this data. In addition, the Loop Surveillance History/Trend card will be reformatted to provide more complete information regarding loop calibrations.

Procedure NPP-CT1-05 will be revised to include the changes discussed above by February 4, 1993.