

JAN - 8 1993

Docket No. 50-341

The Detroit Edison Company
ATTN: W. S. Orser
Senior Vice President
Nuclear Generation
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: NRC EMERGENCY OPERATING PROCEDURE (EOP) TEAM INSPECTION
(REPORT NO. 50-341/92018(DRS))

Dear Mr. Orser:

This refers to the inspection of the Fermi Emergency Operating Procedures (EOPs) by a Region III NRC Team led by Peggy R. Rescheske on November 02 - 23, 1992. The inspection included a review of activities authorized for the Fermi 2 Nuclear Power Station. At the conclusion of the inspection, our findings were discussed with Mr. D. R. Gipson and others identified in the enclosed inspection report.

The inspection focused on your EOPs and the programs for controlling and maintaining these procedures. Emphasis was placed on the July 1991 transition to flowchart format EOPs. The enclosed inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

The Team determined that, in general, the Fermi EOPs, including support procedures, were technically correct and useable, and that the specified actions could be accomplished by the operations staff using existing equipment, controls, and instrumentation. The Team also concluded that the EOPs were adequate for mitigating the accident scenarios described in the BWR Owners Group Emergency Procedure Guidelines. However, given the current Fermi EOP program, the Team could not determine whether the quality of the EOPs would be appropriately controlled and maintained over time. Weaknesses were identified in the EOP Writers Guide, and in Verification and Validation (V&V) program implementation for the flowcharts. These weaknesses were primarily due to the lack of sufficient human factors support during the development and review of the EOP flowcharts and Writers Guide.

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While no technical deficiencies were identified, the Team determined that the EOP flowcharts lacked consistent application of the human engineering principles which support operator performance. As a result, under a high stress emergency condition, the potential exists that the flowcharts would prove to be difficult to use and may not successfully minimize operator confusion and error. In addition, based on the deficiencies identified during the EOP support procedure walkthroughs (e.g., labeling weaknesses), several in-plant tasks would only be accomplished after some confusion or time delay.

We are concerned that the EOP program at Fermi contained weaknesses which are similar to those identified at other utilities over the past few years. It appears that generic information issued by the NRC was not effectively factored into the revision process for the Fermi EOPs. This information included NUREG-0899 which discusses EOP preparation, and NUREG-1358 which discusses lessons learned from the EOP team inspections conducted in 1988.

While no violations of NRC requirements were identified during the course of this inspection, we do request that you respond within 60 days of the date of this letter to the open items identified in the attached inspection report. Your response to the three open items should include a description of the actions you plan to take to resolve each of the specific weaknesses identified in the attached report.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosure, and your response to this letter (regarding the open items) will be placed in the NRC Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

If you have any questions concerning this inspection, please contact Bruce L. Burgess of my staff at (708) 790-5575.

ORIGINAL SIGNED BY T. O. MARTIN
T. O. Martin, Acting Director
Division of Reactor Safety

Enclosure: Inspection Report
No. 50-341/92018(DRS)
See Attached Distribution

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The Detroit Edison Company

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If you have any questions concerning this inspection, please contact Bruce L. Burgess of my staff at (708) 790-5575.

Sincerely,

H. J. Miller, Director
Division of Reactor Safety

Enclosure: Inspection Report
No. 50-341/92018(DRS)

See Attached Distribution

Yes
RIII
Rescheske/cg
01/06/93

Yes
RIII
Langstaff
01/06/93

Yes
RIII
Bielby
01/06/93

RIII
B. Burgess
012/07/93

RIII
M. Phillips
01/07/93

RIII
Wright
01/07/93

RIII
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Martin
01/ /93

RIII
H. Miller
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cc w/enclosure:

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Nuclear Operations

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of Compliance

P. A. Marquardt, Corporate
Legal Department

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OC/LFDCB

Resident Inspector, RIII

James R. Padgett, Michigan Public
Service Commission

Harry H. Voight, Esq.

Michigan Department of
Public Health

Monroe County Office of
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