

**Detroit
Edison**

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July 15, 1985
NE-85-0403

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

Dear Mr. Keppler:

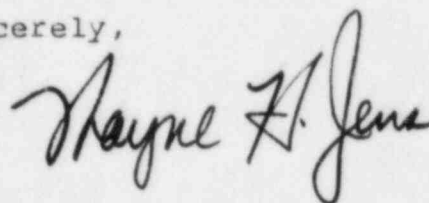
Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-33

Subject: Detroit Edison Response
Inspection Report 50-341/85026

This letter responds to the unresolved items described in your Inspection Report No. 50-341/85026. This inspection was conducted by Mr. R. A. Hasse of NRC Region III on May 13 through 22, 1985.

We trust this letter satisfactorily responds to the unresolved items 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
N. J. Chrissotimos
USNRC, Document Control Desk
Washington, D.C. 20555

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THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85026

DOCKET NO. 50-341

LICENSE NO. NPF-33

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: MAY 13 THROUGH 22, 1985

Unresolved Item 85026-02

During 1984, 57% of the priority 1 and 2 PM tasks and 52% of the priority 3, 4, and 5 tasks were completed. Through April, the completion rate for 1985 was 61% and 44%, respectively. The licensee has conducted no objective evaluation of the impact of these low completion rates. This is considered an unresolved item pending NRC review of the licensee's evaluation of the PM program completion rate.

Detroit Edison Response

Since January of 1985, the task completion rates for the Preventive Maintenance (PM) program have been reported to plant management on a monthly basis. Management considers these rates in the context of the current plant activities. The quoted completion rates for scheduled PM tasks are misleading when taken out of this context. Detroit Edison management is aware of the lower than expected completion rates for the PM activities for 1984 as well as to the 1985 year to date rates. Detroit Edison consciously diverted manpower resources from PM activities to support preoperational testing, surveillance testing, and other plant activities required to ready the plant for fuel load and operation. Some of these activities involved preventative maintenance tasks even though the work was not scheduled via the PM program; therefore, the quoted completion rates may understate the effective completion rate of the PM program.

Fermi 2 has undertaken an ambitious PM program, which is still in its formative stages. As operating experience is accumulated, this program is expected to evolve such that the frequencies and priorities of the program are refined to optimize plant reliability and availability. To this end, and to improve the overall completion rate of PM tasks, a task group has been established for PM activities. This group, comprised of representatives designated by the section heads of operations, maintenance, and the technical group, reviews and evaluates PM activities. This coordinating group will provide a temporary augmentation of the PM program to enhance its evolution. The group is providing improved coordination of tagging and system removal from service to minimize the impact of PM activities on plant operation, safety, and manpower. Edison believes that the work of this group will improve the efficiency and overall effectiveness with which the plant staff accomplishes PM tasks. The group is also helping to refine the scope and scheduling of PM tasks, which, in time, will be reflected in the performance statistics.

Unresolved Item 85026-03

The PM program as described in AD 12.000.17, requires that all PM tasks not completed during the month in which they are issued are cancelled and returned to the PM coordinator (PMC). The PMC then decides whether to reissue the task the following month or wait for the next due date (unless the responsible Section Head requests a reschedule). This system permits lower priority tasks to be completed with resources that could be applied to either overdue, higher priority tasks or overdue tasks of the same priority. This is considered an unresolved item pending licensee revision of the PM program to ensure resources are applied to the highest priority tasks.

Detroit Edison Response

Plant Operations Manual Procedure 12.000.17, "Preventive Maintenance Program", is being revised to emphasize that the responsibility for rescheduling cancelled or incompletd PM tasks rests with the responsible Section Heads. The Section Head, or his designee, will be required to provide a brief justification for the deferral or cancellation of a PM assignment. This procedural change will document currently informal practices of the plant staff. The Section Head is the individual in the best position to determine the alternatives and consequences of deferring scheduled PM tasks. Also, the Section Head is most likely to know when appropriate manpower and necessary equipment and materials will be available to complete the assigned PM tasks.

The PM task group (described in the response to unresolved item 85026-02) which Edison recently formed is helping to improve coordination of PM tasks. By developing associated PM tasks into "taggable blocks", the group is helping to improve the scheduling of PM tasks and to minimize the impact of PM activities on plant safety and manpower. This group also provides an effective means to evaluate the rescheduling of PM tasks which could not be completed.

While it may appear that lower priority PM tasks are being performed with resources which could be devoted to higher priority PM work, the various plant groups assigned to performing PM activities have applied resources to the PM tasks according to the assigned priorities. Because maintenance requires taking equipment out of service, PM tasks cannot always be accomplished according to the assigned priorities without adverse affect on safety, plant operation, or manpower. When higher priority PM tasks cannot be accomplished first, lower priority tasks are addressed. Edison believes that the work of the PM task group provides the means to resolve conflicting PM goals and to select overall higher priority tasks from a broad perspective of plant availability and reliability.