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June 19, 1985
NE-85-0396

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
 NRC License No. NPF-33

Subject: Detroit Edison Response
 Inspection Report 50-341/85021

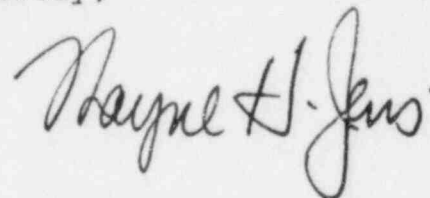
This letter responds to the item of noncompliance described in your Inspection Report No. 50-341/85021. This inspection was conducted by Messrs. P. M. Byron, M. E. Parker, and D. C. Jones of NRC Region III on April 7 through 30, 1985.

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.

We trust this letter satisfactorily responds to the non-compliance 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

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85021

DOCKET NO. 50-341

LICENSE NO. NPF-33

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: APRIL 7 THROUGH 30, 1985

RESPONSE TO NRC INSPECTION REPORT 50-341/85021

Statement of Noncompliance 85021-01

10 CFR 50, Appendix B, Criterion V, as implemented by DECo Quality Assurance Manual, Section 9.0.1 requires that activities affecting quality shall be accomplished in accordance with procedures.

Contrary to the above, Engineering Design Package (EDP) 1996 was not implemented in accordance with Plant Operations Manual (POM) Procedure 12.000.64 "EDP Implementation Procedure." This resulted in the following:

- a. The EDP verification sheet did not adequately reflect the EDP and its accompanying Engineering Change Requests (ECR).
- b. Not all test, vent, and drain (TVD) caps were installed.
- c. POM procedure 47.000.77, "Test, vent, and Drain (TVD) Cap and Plug Verification," omitted a penetration (X-220) which consists of eight TVD caps.

Corrective Action Taken and Results Achieved

- a. The original work order (PN-21 No. 609080 issued on 1-14-85) required the installation of test, vent, and drain connection caps per the direction of Engineering Design Package (EDP) No. 1996. To facilitate implementation, a checklist was developed to determine the current field status (i.e. which test connections currently had caps and which did not) via a walkdown. This walkdown was performed January 15 through 18, 1985. On January 28, 1985, Engineering Change Request (ECR) No. 1996-2 was issued to both delete the installation of some caps required by EDP-1996 and add the installation of other caps not previously identified. These changes were not subsequently incorporated into the original verification walkdown sheet as required by procedure 12.000.64 "EDP Implementation Procedure". The responsible person failed to adhere to plant procedures.

The EDP verification walkdown checklist was changed to incorporate all subsequent revisions to EDP-1996 (ECR's 1996-2, 1996-3, 1996-4 & 1996-5) and the walkdown was reperformed on April 24 and 25, 1985. Also, the EDP

Corrective Action Taken and Results Achieved (cont'd)

Implementation Plan was revised as required by Procedure 12.000.64. In addition, PN-21 No. 992725 was generated on April 15, 1985 to verify installation and add test, vent, and drain caps as required by ECR No. 1996-2. This PN-21 was signed completed on April 19, 1985. Completion of PN-21 No. 992725 and the revised verification walkdown checklist of April 25, 1985 fully document that the current field condition is consistent with the design requirements.

- b. A review of the documentation associated with PN-21 No. 609080 indicated that all caps were installed in accordance with EDP 1996 and ECR's 1996-1 and 1996-2. However, at the time the work was completed there were no administrative controls in place to assure the continued integrity of these caps on their associated test, vent, and drain connections. Since this occurrence, Surveillance Procedure No. 47.000.77 has been issued to administratively control the subject caps. In addition after completion of the EDP, all associated plant drawings will be updated in accordance with procedure to reflect those test and vent connections which require caps.
- c. Penetration X-220 was omitted from Surveillance Procedure 47.000.77 when the procedure preparer was compiling penetration data from the four source documents, including EDP-1996. The preparer overlooked this omission because he used his final product to check against the original source documents instead of using the source documents to reverify the completeness of the final list.

In addition to the above, the technical reviewer of the procedure used the original preparer's source documents to check the information for each penetration identified in the procedure for accuracy but failed to verify that the procedure contained all of the required penetrations.

Immediately after the discrepancy was discovered, the preparer and the technical reviewer reanalyzed all information used to generate the procedure and corrected the procedural deficiency. The revised procedure was submitted and approved by OSRO and the plant superintendent on May 20, 1985. The preparer and

RESPONSE TO NRC INSPECTION REPORT 50-341/85021

Corrective Action Taken and Results Achieved (cont'd)

the technical reviewer were then instructed by their immediate supervisors of the importance of checking and auditing large amounts of technical data systematically and logically to preclude recurrence of this type of error on any future documents which might be generated by these individuals.

Corrective Action to Prevent Further Noncompliance

Detroit Edison has procedures in place to prepare EDP implementation packages and to prepare and technically review procedures to ensure correct technical and work content. These procedures were not adequately implemented. The individual who incorrectly implemented plant procedure 12.000.64 which resulted in the failure to incorporate ECR 1996-2 into the walkdown checklist was instructed to read the procedure again and fully acquaint himself with all of its requirements. As discussed in c. above, the personnel involved in the preparation and review of Surveillance Procedure 47.000.77 have been apprised of the importance of thorough review of their work against the governing documents.

As stated in b. above, Procedure No. 47.000.77 has been issued to provide administrative controls over the subject caps. Additional assurance will be provided once the associated plant drawings have been updated to reflect these caps. This will provide assurance that the required caps remain in place.

Date When Full Compliance will be achieved

The drawings will be updated to reflect the required caps by November 30, 1985. At that time, Detroit Edison will be in full compliance.