

U.S. NUCLEAR REGULATORY COMMISSION

REGION 111

Report No. 50-341/93002(DRP)

Docket No. 50-341

License Nos. NPF-43

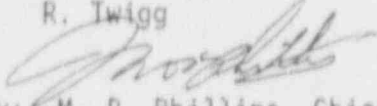
Licensee: Detroit Edison Company
2000 Second Avenue
Detroit, MI 48226

Facility Name: Fermi 2

Inspection At: Fermi Site, Newport, Michigan

Inspection Conducted: January 23 through February 11, 1993

Inspectors: W. J. Kropp
R. Twigg

Approved By:  M. P. Phillips, Chief
Reactor Projects Section 2B

2/11/93
Date

Inspection Summary:

Inspection from January 23 through February 11, 1993
(Report No. 50-341/93002(DRP))

Areas Inspected: Routine, unannounced safety inspection by the resident inspectors of action on a previous inspection finding; the audit program; auditor qualifications; audit reports; and audit exit meetings (Inspection Procedure (IP) 40702).

Results: No violations or deviations were identified. One previous inspection finding concerning the Service Information Letter (SIL) process was closed. The inspectors determined through sampling of auditor qualifications, audit reports, and audit exit meetings that the licensee has developed a quality assurance program that is in conformance with Technical Specifications, regulatory requirements, commitments in the Updated Final Safety Analysis Report, and industry codes and standards. The inspectors concluded that the overall effectiveness of the audit program was good. The qualifications of the auditors were good, and the auditors application of performance based techniques was excellent. Overall, the audit reports were thorough and adequate in reporting the results documented in the checklists. One Inspector Followup Item was identified that pertained to documentation and followup of audit observations. The communication of audit results during exit meetings was good.

DETAILS

1. Persons Contacted:

Detroit Edison Company

- * W. Orser, Senior Vice President, Nuclear Operations
- * R. McKeon, Plant Manager, Nuclear Production
- * W. Miller, Superintendent, Technical Engineer
- * R. Newkirk, General Director, Regulatory Affairs
- * J. Plona, Superintendent, Operations
- * J. Tibai, Supervisor, Compliance
- * J. Bragg, Principal, Quality Engineer Audits
- * T. Braddish, Supervisor, Quality Program Assurance
- * L. Goodman, Director, Nuclear Quality Assurance

*Denotes those attending the exit interview conducted on February 11, 1993.

2. Action on Previous Inspection Findings (92701)

(Closed) Unresolved Item (341/92017-05 (DRP)): In September 1988, the licensee had received General Electric (GE) Service Information Letter (SIL) 470 which identified concerns with reactor water level mismatches. Two of the recommendations provided by the SIL for reducing the chances of unexpected water level mismatches were backfill the process instrument piping after surveillance testing, and train plant operations personnel in appropriate methods for responding to mismatches between water level instrument indications. The licensee evaluated the SIL under Deviation Event Report (DER) 88-1833 and decided not to implement the two recommendations mentioned above. After a subsequent reactor water level scram, documented in LER 90011, the licensee determined that the recommendation for backfilling the reference legs should have been implemented and issued DER 90-625 to reevaluate GE SIL 470. Pending a review of DER 90-625, the SIL process was considered an Unresolved Item in inspection report 92017.

The inspectors selected four GE SILs, reviewed the disposition of DER 90-625 and evaluated the licensee's resolution of the GE recommendations. The inspectors did not identify any concerns with the GE SILs, the DER, or the resolution of the GE recommendations. Based on these reviews, the inspectors consider this item closed.

3. Audit Program (40702)

The effectiveness of the Fermi audit program was assessed by the inspectors in the areas of auditor qualifications, audit reports, and audit exit meetings. The inspectors verified that the scope of the audit program was defined and that the responsibilities for overall management of the program were assigned. Overall assessment of the program was good.

a. Auditor Qualifications

Based on interviews with auditors and reviews of personnel records, the inspectors determined that the qualifications of the audit personnel were good. The auditors' backgrounds included maintenance, Senior Reactor Operator and Reactor Operator qualifications, engineering degrees, and specialized industry training in several disciplines. When needed for specific audits, the licensee obtained special expertise from other Fermi or industry employees. Through discussions with the licensee, the inspectors verified that no auditor was allowed to participate in an audit of an area in which he had any prior direct responsibilities. Any indirect responsibilities were reviewed on a case by case basis to ensure the independence of the auditor. The inspectors reviewed a sample of audit checklists and found the checklists to be comprehensive and relevant to the scope of the audit. The issues identified by the auditors and documented in the sample checklists demonstrated that performance based audits were conducted. The auditors' application of performance based audit techniques was excellent.

b. Audit Reports

The inspectors reviewed the following audit reports to assess their effectiveness in reporting audit results to management as documented in the audit checklist:

- Audit Report 91-0105 "Evaluation and Corrective Actions"
- Audit Report 91-0130 "Operations"
- Audit Report 91-0193 "Preventive Maintenance"
- Audit Report 91-0215 "Selected Electrical I&C Design Calculations"
- Audit Report 92-0070 "Evaluation and Corrective Actions"
- Audit Report 92-0084 "Operations"
- Audit Report 92-0097 "Corrective Maintenance"
- Audit Report 92-0109 "Tech Spec Surveillance"
- Audit Report 92-0129 "Evaluation and Corrective Actions"
- Audit Report 92-0146 "Maintenance-PM Program"

Overall, the audit reports were thorough and adequate in reporting the results documented in the checklists. The audit process consisted of observations categorized by three levels of required actions. The most significant observations were classified as "findings" and required formal reviews through the Deviation Event Report (DER) process. Other observations were divided into those requiring written responses from the audited organization and those that required only a review in the next audit. Those observations that were classified as findings or that required written response were adequately documented and followed up. However, the inspectors were concerned with the ability of the audit program to document and followup on the audit observations not requiring written response.

An example is Observation #6 of Audit Report 91-0193, Preventive Maintenance. The observation noted the increased savings and greater efficiency in the maintenance department that could result if predictive data on oil sampling was used more effectively. The observation identified only one component failure (EDG air compressor) where oil sample information was not effectively utilized. However, the audit checklist covered the period from November 18 through December 6, 1991 and identified three significant examples where components failed. The failures involved an air compressor for an emergency diesel generator (EDG); the South Heater Drains Pump (SHDP); and the North Off-Gas Ring Water Pump (NOGRWP). Two of the failures were related to the effectiveness of the licensee's oil sampling program (EDG and SHDP), while the other pertained to not finding enough oil in the reservoir to take an oil sample (NOGRWP). Also, during the audit, the High Pressure Coolant Injection (HPSI) pump failed a surveillance that was subsequently determined to be attributed to water in the oil. The audit checklist also identified other older examples of components that had water ingress into the oil which were not handled administratively in an effective manner. Even though the audit checklist documented an issue with the licensee's predictive maintenance program in the area of oil sampling, the observation written for the audit report did not identify the problem and required no written response. The inspectors were concerned that the significance of the problem with administering the oil sampling program was not adequately identified for senior management not present at the audit exit meeting. An additional concern was adequate followup. The inspectors determined that the licensee initiated actions to improve the oil sampling program soon after the audit, but the audit of the preventive maintenance program conducted in late 1992 (Audit Report 92-0146) did not include assessment of the effectiveness of those actions. No surveillance has been performed on the oil sampling program since the performance of Audit 91-0193. The documenting and followup of audit observations is considered an Inspector followup item pending further NRC review (341/93002-01 (DRP)).

c. Audit Exit Meetings

By observing an audit pre-exit and an audit exit, the inspectors determined that verbal communication of the audit results was good. In discussions with the licensee, the inspectors found that the audit organization views the exits as a means to communicate details not included in the audit reports. Both the exit and pre-exit were well delivered and found to be a good exchange between the auditors and those present.

4. Inspection Followup Items

Inspection Followup items are matters which have been discussed with the licensee, which will be reviewed by the inspector and which involve some action on the part of the NRC or licensee or both. An Inspection Followup Item disclosed during the inspection is discussed in paragraph 3.b.

5. Exit Interview (30703)

The inspectors met with the licensee representatives denoted in paragraph 1 during the inspection period and at the conclusion of the inspection on February 11, 1993. The inspectors summarized the scope and results of the inspection and discussed the likely content of this inspection report. The licensee acknowledged the information and did not indicate that any of the information disclosed during the inspection could be considered proprietary in nature.