U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-341/85026(DRS)

Docket No. 50-341 License No. NPF-33

Licensee: Detroit Edison Company
2000 Second Avenue
Detroit, MI 48224

Facility Name: Fermi Nuclear Power Plant, Unit 2

Inspection At: Fermi 2 Site, Monroe, Michigan

Inspection Conducted: May 13-22, 1985

Inspector: R. Hasse 5-29-85
Date

Accompanying
Personnel: D. Jones

Approved By: F. Hawkins, Chief
Quality Assurance Programs Section 5/29/85
Date

Inspection Summary

Inspection on May 13-22, 1985 (Report No. 50-341/85026(DRS))
Areas Inspected: Routine, unannounced inspection by a Region III based inspector of maintenance, design change, surveillance, and tests and experiments programs and the quality assurance program for startup activities. The inspection involved a total of 60 onsite inspector-hours by one NRC inspector.
Results: No violations or deviations were identified in the five areas inspected.

DETAILS

1. Persons Contacted

Detroit Edison Company

*E. Griffing, Assistant Manager, Nuclear Operations
*G. Trahey, Director, Nuclear QA
*J. Conen, Licensing Engineer
*B. Wickman, Supervisor, Maintenance and Modifications QA
*J. Nyquist, Assistant to Superintendent, Nuclear Production
W. Miller, Supervisor, Operational Assurance
R. Szkotnicki, Supervisor, Technical Staff
F. Schwartz, Supervisor, QA Staff
E. Preston, Operations Engineer
T. Byrd, Supervisor, Procurement QA

USNRC

P. Byron, Senior Resident Inspector
*D. Jones, Resident Inspection Staff

Other personnel were contacted as a matter of routine during the inspection.

*Denotes those attending the exit interview on May 22, 1985.

2. Action on Previous Inspection Findings

(Closed) Noncompliance (341/84-48-02): Failure to ensure inspection procedures used by the General Procurement Inspection Division (GPID) were reviewed and approved by Nuclear Quality Assurance (NQA). The GPID now performs its inspections in accordance with procedures and plans approved by NQA. Inspection Reports are also approved by NQA. In addition, GPID inspectors have been certified as Level II inspectors in accordance with ANSI N45.2.6-1978.

3. Program Areas Inspected

During this inspection, the adequacy of implementation of the licensee's maintenance, modifications, surveillance, and test and experiments programs was reviewed. This was a followup to the program reviews of these areas documented in Inspection Report 50-341/84-25(DRS). In addition, the licensee's program for QA coverage of startup activities and its implementation were reviewed for adequacy.

a. Quality Assurance for Startup Activities

The startup QA program consists of three elements: (1) 100% surveillance of startup testing for procedure compliance by Operational Assurance; (2) periodic audits by the Nuclear Quality Assurance audit function and; (3) inspections performed by the quality control function for specific test steps.

(1) Startup testing surveillance is accomplished using a standardized checklist contained in "Procedure Compliance Module for Startup/Demonstration Testing", Revision 1. The surveillance covers the initial test review against the Technical Specification through test completion and review and approval of results. A review of the module and all completed surveillances to date indicated that the program was adequate and properly implemented.

(2) The inspector reviewed the audit schedule for startup activities and several recently completed audits of this area. The audit schedule was adequate and the completed audits were properly conducted. Responses to audit findings were also adequate. However, the inspector noted during this review that many actions related to audit findings, not restricted to startup activities, were overdue (23 of 85 actions). The overdue actions were initial responses by the audited organization, responses to inadequacies in the initial response, and completion of corrective actions.

Licensee personnel stated that they were aware of this timeliness problem and had taken action to correct it. A Nuclear Operations Directive (NOD) had recently been issued addressing this issue. Also, a letter had recently been issued by the Vice President, Nuclear Operations indicating that timeliness in response to such issues was to be part of an employee's performance appraisal. This is considered an unresolved item pending NRC review of the effectiveness of the licensee's corrective action (341/85026-01).

No violations or deviations were identified.

b. Maintenance Program Implementation

The administrative controls for the maintenance program were described in Administrative Procedure (AD) 12.000.15, "PN-21 (Work Order) Processing." Implementation detail was contained in various maintenance instructions. The preventive maintenance (PM) program was described in AD 12.000.17, "PM Program." The PM program also includes instrument calibrations not specified in the Technical Specifications.

(1) A review of selected completed work packages indicated that completed maintenance activities were conducted in accordance with the program.

(2) A review of the implementation of the PM program resulted in the following concerns:

(a) 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 (341/85026-02).

(b) 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 (341/85026-03).

(c) The licensee has established an 18 month frequency for instrument calibrations which are not specified by the Technical Specifications. Based on a cursory review, the inspector is concerned that the specified frequency is not sufficiently conservative. The adequacy of the 18 month calibration period for non-Technical Specification calibrations is considered an open item pending further NRC review (341/85026-04).

No violations or deviations were identified.

c. Surveillance Program Implementation

The surveillance program is controlled by Procedure AD 12.000.18, "Surveillance Program." A master list is maintained which cross references the specific Technical Specification requirement, the implementing procedure, and the surveillance frequency. The inspector compared a sample of Technical Specification surveillance requirements to the master surveillance list. With one exception, implementing procedures had been prepared and the specified frequencies were consistent. Specifically, Technical Specification 6.8.4.a. requires that a program be established to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. Specification 6.8.4.a.1 specifies that as part of this program, preventive maintenance and periodic inspection requirements be established. The implementing procedures for Specification 6.8.4.a.1 have not been prepared. This is considered an open item to be completed by the licensee and reviewed by the NRC prior to commercial operation (341/85026-05).

No violations or deviations were identified.

d. Tests and Experiments

Tests and experiments not described in the FSAR are controlled in the same manner as a modification. To date, no such tests or

experiments have been performed by the licensee under the operations program. Implementation of this program will be assessed during the routine inspection program.

e. Design Changes and Modifications

The design change program is controlled by Procedure AD 12.000.64, "EDP Implementation Procedure", and a series of Nuclear Engineering (NE) procedures. Nuclear Engineering is responsible for preparing the design package and the operating organization is responsible for implementation. Nuclear Engineering conducts a final review after implementation. The inspector reviewed a sample of completed Engineering Design Packages (EDPs). The packages had been properly prepared and implemented.

The inspector did note that some safety evaluations tended to be weak. Criteria used for the evaluation were design intent and they excluded consideration of design details, such as system interfaces. The design changes available for review were not sufficiently complex to make a good assessment of this issue. The inspector discussed this matter with the licensee and noted that updating safety evaluations as the designs are detailed represents good practice. The inspector had no further questions in this area.

No violations or deviations were identified.

4. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Three unresolved items disclosed during this inspection are discussed in Paragraphs 3.a and 3.b.

5. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. Two open items disclosed during this inspection are discussed in Paragraphs 3.b. and 3.c.

6. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on May 22, 1985, and summarized the purpose, scope, and findings of the inspection. Discussions with licensee personnel indicated that the inspector had no access to proprietary information during the inspection.