

DMS

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May 24, 1985
EF2-70453

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

Subject: Detroit Edison Response
Inspection Report 50-341/85010

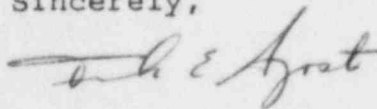
This letter responds to the item of noncompliance described in your Inspection Report No. 50-341/85010. This inspection was conducted by Mr. C. H. Scheibelhut of NRC Region III during February and March, 1985.

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.

The enclosed response is arranged to correspond to the sequence of items cited in the body of the inspection report. The appropriate criterion and the number identifying the item are referenced.

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
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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85010

DOCKET NO. 50-341

LICENSE NO. NPF-33

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: FEBRUARY AND MARCH 1985

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85010

Statement of Noncompliance 85010-01

10 CFR 50, Appendix B, Criterion X, as implemented by DECo Operational Quality Assurance Program Requirement 10, requires that inspections shall be performed of activities affecting quality to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Contrary to the above, numerous PN-21s (work orders) written to provide proper labeling of specified plant equipment were not adequately reviewed subsequent to the work being completed. This resulted in the existence of nonconforming conditions not being properly identified and reviewed for root cause determination.

Corrective Action Taken and Results Achieved

The Duke Power Company Construction Assessment Team (CAT) finding/concern No. 16 dealt with labeling problems on electrical switchgear. In response to this concern, Detroit Edison started a program to provide proper labels (nameplates) for major electrical equipment such as switchgear. Using the latest drawings, Detroit Edison inspected the equipment, noted the deficiencies and wrote PN-21s (Work Orders) to provide labeling. Labels were subsequently installed on the equipment.

Thereafter, an NRC inspector requested a field tour to inspect a sampling of the equipment for proper nameplates. The latest revisions of the applicable drawings were obtained from the Document Control Center. This inspection again found discrepancies between the drawings and the equipment nameplates.

An investigation of this situation revealed that drawing revisions had been issued after the nameplates had been installed to address the CAT concern. These drawing revisions included, among other things, changes to some of the nameplates. However, a drawing change notification, which would have highlighted changes affecting the nameplates, was not issued. Therefore, when the inspector reviewed the equipment nameplates against the later drawing revisions, discrepancies were noted.

Because of the incident, on February 11, 1985, a Stop Work Order was issued by Nuclear Quality Assurance on all electrical and I&C labeling. The order was lifted on February 19, 1985 after:

1. Drawings that were issued without change notification were identified, and

Corrective Action Taken and Results Achieved (Cont'd)

2. Fermi 2 Engineering issued a policy statement (F2E 85-0256, dated February 11, 1985) requiring that Nuclear Operations design change documents must be used for all future revisions to design documents. Engineering procedures were subsequently revised to implement this.

Based on the identified drawing list, field walkdowns were performed and discrepancies between the nameplates and drawings were documented on Deviation/Events Reports (DER). After evaluation of these DERs, the drawings will be revised accordingly and/or proper nameplates will be installed.

During the previous nameplate installation program, had the PN-21s been properly reviewed, the existence of nonconforming conditions would have been identified with subsequent DER initiation and determination of cause. To address this concern, on March 20, 1985, the Plant Superintendent issued a memorandum to Section Heads, "Reviewing PN-21's for Possible Non-Conformance." It stated that, "The purpose of this memorandum is to point out this recent occurrence [of an inadequate review] and to remind Section Heads and their designees of the importance of an adequate review of PN-21's for potential non-conforming conditions."

Corrective Action Taken to Avoid Further Noncompliance

As stated previously in this response, Nuclear Operations design change documents must now be used for all future revisions to design documents. This ensures that plant personnel are notified of all changes to affected drawings so that appropriate action may be taken.

Date When Full Compliance Will Be Achieved

The remaining item to complete is the revision of necessary drawings and the installation of required nameplates for the electrical equipment. This will be completed before commercial operation, after which Detroit Edison will be in full compliance on this matter.