

**Detroit
Edison**

Douglas R. Gipson
Senior Vice President
Nuclear Generation

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5249

10 CFR 2.201

October 28, 1996

NRC-96-0095

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) NRC Integrated Inspection Report 50-341/96006
Dated September 26, 1996
 - 3) NRC Integrated Inspection Report No. 50-341/96004
Dated June 14, 1996
 - 4) Detroit Edison Letter NRC-96-0071
Reply to Notices of Violation (96004-06 and 96004-05)
Dated July 15, 1996

Subject: Reply to Notices of Violation (96006-01, 96006-03, and 96006-05)

Enclosed is Detroit Edison's response to the Notices of Violation (NOVs) contained in Reference 2.

As requested in the Inspection Report cover letter, the response to Violation 96006-01 includes a discussion of corrective actions implemented in response to the continuing trend of inadequate procedures. We recognize the importance of accurate procedures and adherence to those procedures, and have actions planned or in progress to improve the technical adequacy of the Fermi 2 procedures.

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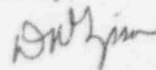
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The following commitment, as noted in the response to NOV 96006-03, is being made in this letter:

Administrative controls for the storage or staging of equipment will be reviewed to determine if the existing requirements should be incorporated into the Conduct Manual.

Should you have any questions regarding this response, please contact Ronald Wittschen, Compliance Engineer at (313) 586-1267.

Sincerely,



cc: A. B. Beach
M. J. Jordan
A. J. Kugler
A. Vogel
Region III

Response to Notice of Violation 50-341/96006-01

Statement of Notice of Violation

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, as of July 11, 1996, operating procedure 23.208 "Residual Heat Removal Complex Service Water System," did not provide the required position for vent valve E1100-F258.

Reason for the Violation

Vent valve E1100-F258, which is shown on the Functional Operating Sketch 6M721-5706-3, was not identified in the System Operating Procedure (SOP) 23.208, "Residual Heat Removal (RHR) Complex Service Water System." During the Service Water System Operational Performance Inspection (SWSOPI) followup in July 1996, the inspector identified that SOP 23.208 was inadequate in that it did not ensure system configuration was maintained by including all system valves in the system lineup verification. An investigation of this discrepancy concluded that the vent valves were installed during construction but are not required for normal operating conditions and were inadvertently not included in the SOP.

The Corrective Steps That Have Been Taken and the Results Achieved

When the discrepancy was identified, a Deviation Event Report (DER) was written, the operations staff walked down portions of the RHR Service Water System in the normally not accessed underground 'pit' where vent valve E1100-F258 is located and initiated a temporary procedure change to incorporate valve E1100-F258, and two other valves (E1100-F259 and P4500-F401), identified during the walkdown, into SOP 23.208. Based on the walkdown results, the operations staff also requested labels for these three components.

Based on the hydraulic model of the original system design, a void in the system potentially caused by inadequate venting would have negligible impact on system operation. The investigation found no evidence that the valves had leaked in the past. The effects of potential freezing were evaluated and determined not to be a significant concern. Therefore, the discrepancy was of minor safety significance.

The valves have since been properly labeled and SOP 23.208 has been revised to incorporate the three valves. To minimize potential leakage, caps have been placed on the valve nipples.

The Corrective Steps That Will Be Taken to Avoid Further Violations:

The Plant Labeling Program was established approximately two years ago to address inconsistent or missing information in plant component identification and labeling. The program prioritizes components to be labeled on a system basis and involves a walkdown where configuration errors and concerns are identified and tracked to resolution. The program has been effective in identifying and resolving similar configuration control issues. These valves were not previously identified because the RHR Service Water System walkdown had not yet been performed at the time of the inspection in July 1996, but is scheduled to be completed in early November 1996. The Plant Labeling Program is approximately 50% complete and is expected to require another two years for full completion.

Date When Full Compliance Will be Achieved

Detroit Edison is in full compliance.

Additional Information Requested in Inspection Report 96006

NRC requested that this response also include a discussion of corrective actions implemented to address inadequate procedures. Recent self assessments indicated that previous efforts to address procedural adequacy have not been as effective as expected. In response several additional initiatives were undertaken to further address the procedure adequacy issue. Senior management directed a review of the administrative Conduct Manual against specified criteria. A site wide Stand Down Day was dedicated to reflect on the collective responsibility for a successful outage. Management expectations including procedural adequacy and procedural adherence were stressed. Everyday meetings and discussions of activities focus on procedure use and adherence. Outside signboards and E-mail also reinforced the message. The number of Document Change Requests (DCRs) and Temporary Changes Notices for procedures has increased and believed to be indicative of the heightened awareness to identify and correct procedural discrepancies.

The need for continuing improvement in performance in the Operations functional area was recognized. As a result a comprehensive Operational Excellence Plan has been drafted with approval expected in November. Implementation will require a deliberate, focused, managed approach. The plan is being developed jointly by Operations, Training, Work Control and Quality Assurance and reviewed by other functional support organizations with oversight by Quality Assurance. It is an integrated effort to address findings from several sources. SALP Reports, past INPO Plant Evaluations, and internal assessments were used in the plan development. A key part of the plan includes improvements in the areas of operator communications, procedural adequacy, procedural adherence, and configuration control. The plan has a challenging scope and an aggressive schedule, and represents Detroit Edison's response to the recognized need for improvement in the Operations functional area and for stronger corrective actions to support continued improvement. It is intended to be an on-going program which may be changed to reflect additional corrective actions determined to be appropriate.

Response to Notice of Violation 50-341/96006-03

Statement of Notice of Violation

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires in part, that activities affecting quality shall be accomplished in accordance with procedures appropriate to the circumstances. Fermi 2 Operations Conduct Manual, Chapter 11, "Fire Protection," Section 3.4, "Storage Outside of Warehouse Facilities," stated in part that a Temporary Plant Space Request be initiated when staging equipment which is not seismically restrained in the Auxiliary Building.

Contrary to the above, on August 1, 1996, a Temporary Plant Space Request was not initiated for equipment which were not seismically restrained in the Division II Battery Room, located in the Auxiliary Building.

Reason for the Violation

Operations Conduct Manual Chapter 11, "Fire Protection," (MOP 11), requires that a temporary plant space request (TPSR) be initiated when storing or staging equipment in the Reactor, Auxiliary and RHR buildings. These requirements were not met during the period from August 1 to August 5, 1996, subsequent to maintenance activities on the 2B-1 battery charger, when the temporary batteries and the metal cart were stored in the Division 2 battery room. This violation was the result of maintenance personnel not following procedures and training. It is recognized that the requirements for the restraint of equipment contained in MOP 11 are not prescriptive.

Corrective Steps That Have Been Taken and the Results Achieved

The temporary batteries were removed from the battery room. A seismic evaluation was performed which concluded the impact of storing the temporary batteries was insignificant from a seismic standpoint. The electrical maintenance supervisor initiated required reading on restraint of loose items for the electrical maintenance group.

Corrective Steps That Will Be Taken To Avoid Further Violations

Administrative controls for the storage or staging of equipment will be reviewed to determine if the existing requirements should be incorporated into the Conduct Manual to increase personnel awareness of the need to restrain temporarily stored equipment.

Date When Full Compliance Will be Achieved

Detroit Edison is in full compliance.

Response to Notice of Violation 50-341/96006-05

Statement of Notice of Violation

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," requires in part, that measures be established to assure that conditions adverse to quality, such as deficiencies, defective material and equipment are promptly identified and corrected. It further requires, in part, that in the case of significant conditions adverse to quality, measures be established to assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on July 29, 1996, inspectors identified that adequate corrective actions to preclude repetition of a significant condition adverse to quality, plugging of the one-inch drain line on the Division 1 Residual Heat Removal Service Water return line to the "A" Mechanical Draft Cooling Tower, previously identified on March 31, 1996, were not taken in that the drain line was again partially plugged.

Reason for the Violation

On July 29, the inspectors identified that one of the mechanical draft cooling tower (MDCT) return line drain lines was partially plugged. Inspectors had previously identified a similar problem in Inspection Report 96004 dated June 14, 1996 (Reference 3).

The purpose of the drain lines is to allow the MDCT spray distribution system to empty when not in use. The return lines from the spray distribution header are partially exposed to outside temperatures and there is a potential that they could freeze in the event of extremely cold weather. After operation of the MDCTs is stopped, the line clears by draining through the one inch drain line, thus precluding the chance for the lines to freeze.

The Detroit Edison response to Notice of Violation (NOV) 96004-05 (Reference 4), identified corrective actions including: "As an interim measure, the drain lines have been included in the routine System Engineering walkdown checklist for periodic monitoring." Detroit Edison acknowledges the commitment and the stated violation. As noted in the violation, inspections were not scheduled to coincide with operation of the mechanical draft cooling tower which resulted in a missed opportunity to gather data to ensure that planned corrective actions would address the plugged pipe problem.

Corrective Steps Taken and the Results Achieved

The drain lines for the RHR/SW return lines to the MDCTs have been modified. The location of the drain line tap on the return line was changed from the low point to a location which will allow complete draining of the lines exposed to outside temperatures but will be less susceptible to plugging by rust and corrosion products. The modification also altered the lines so that flow from the drain lines is easily observed. The System Operating Procedure (SOP) has been revised to require the verification of flow from the continuous drain lines whenever the MDCTs are in

service. The design basis document (DBD) has been revised and changes to the UFSAR have been identified and will be incorporated in the next scheduled update. In retrospect, the commitment to perform interim walkdowns was unnecessary since Detroit Edison committed to provide a permanent resolution of the potential freezing concern before the onset of cold weather. As acknowledged in Inspection Report 96006 (Reference 2) there was no possibility of freezing during the inspection period.

Corrective Steps That Will Be Taken to Prevent Recurrence

Since the permanent solution has been implemented no further corrective actions are considered necessary.

Date When Full Compliance Will be Achieved

Detroit Edison is in full compliance.