

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

September 5, 1985
RC-LG-85-0017

Dm B

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

(2) Letter, J. G. Keppler to W. H. Jens,
dated July 16, 1985

Subject: Completion of Actions Described in
Confirmatory Action Letter (Reference 2)

Reference 2 documented the actions to be taken by Detroit Edison prior to exceeding 5% power as a result of the control rod withdrawal event on July 1, 1985. This letter documents the actions taken to complete each item, as follows:

Item 1 - Provide to NRC Region III the results of your evaluation of the inadvertent criticality event of July 2, 1985, including corrective actions you have or will take. Include in your report the bases for not reporting this event to the NRC.

Action Taken - On July 23, 1985 Detroit Edison presented the results of its evaluation to members of your staff. This presentation included a discussion of root causes and contributing causes and identified the corrective actions prescribed to address these causes. In addition, this presentation provided the bases used to determine reporting requirements for the event. A copy of this presentation, annotated to reflect the status of corrective actions, is enclosed.

Item 2 - Assure that operations personnel are properly trained and understand the applicable procedure(s) for subsequent control rod manipulations.

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Action Taken - Supplemental training on the current requirements for control rod manipulations, including the reduced notch worth pull concept, has been completed for all six shifts.

Item 3 - Assure that all operations personnel are aware of the event and its potential significance.

Action Taken - All licensed operators and numerous support personnel have attended a presentation conducted by Fermi 2 management on the details and significance of this event, including the significance attached to it by the NRC and the subsequent actions taken.

Item 4 - Verify the operability and/or validity of the program for the Rod Worth Minimizer.

Action Taken - Operability and validity of the Rod Worth Minimizer System (RWMS) has been verified. This system performed as designed during the subject event, and it meets its design basis for postulated control rod drop. Since the meeting of July 23, Detroit Edison has modified the RWMS program for control rod groups 3 and 4 to provide partial enforcement of the reduced notch worth concept.

Item 5 - Verify that training programs at your simulator are consistent with the current procedures being implemented at the facility.

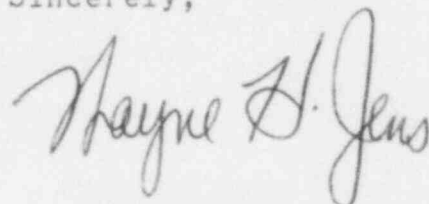
Action Taken - Prior to this event, the sample rod pull sheets used at the simulator specified the withdrawal of group 3 rods to position 48 in one step, which was not consistent with the reduced notch worth concept in use at the plant. This has been corrected. In addition, Detroit Edison's Nuclear Quality Assurance group has performed a surveillance on the procedures and attachments in use at the simulator. Based on this, Detroit Edison has concluded that the training at the simulator is consistent with the Fermi 2 operating procedures.

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Item 6 - After all actions required above are completed, obtain verbal concurrence from the NRC Region III Regional Administrator or his designee prior to exceeding 5% reactor power.

Action Taken - All of the above actions have been completed and are available for NRC inspection. Based on the above, Detroit Edison requests concurrence to proceed with power ascension.

Sincerely,

A handwritten signature in dark ink, appearing to read "Wayne H. Jens". The signature is written in a cursive style with a large, stylized "W" and "J".

cc: P. M. Byron
M. D. Lynch
G. C. Wright
USNRC, Document Control Desk
Washington, D.C. 20555