

DEC 24 1985

Docket No. 50-341

Detroit Edison Company
ATTN: Wayne H. Jens
Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

The Detroit Edison Company's Fermi 2 Nuclear Power Plant has experienced numerous events involving operational errors and degraded plant equipment. Furthermore, programmatic weaknesses have been identified by the NRC concerning engineering and security. A number of the events occurred despite the efforts of your Company to improve the regulatory performance of the Fermi 2 station.

The events of concern can be attributed to four functional areas: operations, maintenance, engineering and security. The operations group, and to a lesser extent, the maintenance group, were responsible for a number of the events including; (1) the premature criticality, (2) a license violation which shut off cooling water for an entire ECCS Division, (3) six technical specification limiting condition of operation violations, (4) multiple personnel errors, (5) rupture of the condensate storage tank and (6) an "unmonitored" release of slightly contaminated water from the site. The engineering staff was responsible in part for (1) failure of the south reactor feedpump turbine, (2) failure to perform proper stress analysis following system modifications, and (3) error in routing a 4160 volt bus in the same vicinity as the remote shutdown cables without proper fire protection. The security organization has been unable to properly implement the provisions of the security plan as evidenced by the numerous violations identified by both Detroit Edison and the NRC.

The diversity of problems and functional areas involved with these problems indicate to the NRC that the present management systems have been ineffective. If left uncorrected, and current trends continue, significant safety problems may develop at the Fermi 2 facility. Accordingly, to enable us to determine whether or not the Fermi 2 license should be modified, suspended, or revoked, you are requested, pursuant to the provisions of 10 CFR 50.54(f), to evaluate and address the following:

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1. The adequacy of management, management structures and systems that have contributed to the performance of Fermi 2; the adequacy of training to assure that responsible personnel recognize and respond, as appropriate, to significant safety conditions; and, changes in controls needed to assure improved regulatory performance. The areas of operations, maintenance, engineering and security should be included in your evaluation.
2. Actions you plan to take to ensure readiness of the facility to support restart of the unit and power escalation after testing is completed at each power ascension plateau. Include in your assessment how you will review the management and system performance at each plateau, who will perform the review, objective criteria for determining adequacy of performance at each plateau, and the manager who will authorize proceeding to the next plateau.
3. Actions you will take to improve regulatory and operational performance during and after the startup testing phase of operations.

Pursuant to 10 CFR 50.54(f), you are requested to furnish, under oath or affirmation, no later than 30 days from the date of this letter, your plans and programs to address the items identified above.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

cc: L. P. Bregni, Licensing
Engineer
P. A. Marquardt, Corporate
Legal Department
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Ronald Callen, Michigan
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