

NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2

Docket No. 50-341
License No. NPF-43

During an NRC inspection conducted on May 12 through May 30, 1997, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

1. Technical Specification Section 6.8.1 required, in part, that written procedures shall be established, implemented, and maintained covering the Fire Protection Program.

The Fire Protection Program required periodic inspection, maintenance, and surveillance testing of the fire detection and protection systems.

Maintenance Conduct Manual, MMA11 "Post-Maintenance Testing (PMT) Guidelines," Revision 2, Section 3.2, stated, in part, "The scope of the PMT shall be based on the maintenance activity performed. A satisfactory PMT is one that: (1) Demonstrates correction of the original deficiency under normal operating conditions and/or plant conditions at the time of the failure, (2) Ensures no new or related deficiencies have been created, and (3) Ensures the system or component can perform its intended function."

Fire Protection Procedure 28.504.003, "Fire Suppression Water System Simulated Automatic Actuation Test," Revision 3, Section 5.2, required verification that the engine speed met acceptable limits of 2100 to 2300 rpm.

Contrary to the above:

- a. On May 11, 1997, the licensee failed to perform adequate post-maintenance testing (PMT) to ensure that a new deficiency was not created due to maintenance. Specifically, the completed maintenance on the diesel driven fire pump included reducing the engine speed from 2440 rpm to 2150 rpm. However, the licensee's PMT did not verify that the resultant pump pressure and flow would still meet requirements such that the pump would still perform its intended function.
- b. On May 2, 1997, the licensee failed to verify that the engine speed was operating within the acceptable limits of 2100 to 2300 rpm. Specifically, the licensee accepted Section 5.2 of the surveillance as satisfactory with the engine speed documented as 2440 rpm. No technical justification for this acceptance was provided.

This is a Severity Level IV violation (Supplement 1)

2. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," required, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances

and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, on April 28, 1997, electrical maintenance personnel put defective parts back in, cleaned, lubricated, and exercised the fused disconnect switch in motor control center (MCC) 72E-5A, Position 5C, without work instructions appropriate to the circumstances. Specifically, while troubleshooting and replacing switching mechanisms on MCC 72E-5A Position 3C under Work Request No. 000Z974256, personnel went beyond the scope of the work request to perform maintenance on the switch at position 5C.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion III "Design Control" required, in part, that measures be established for the selection and review for suitability of application of materials, parts, equipment and processes that are essential to the safety-related functions of structures, systems and components.

Contrary to the above:

- a. On May 13, 1997, a nonsafety-related turbo charger blower cover gasket was installed on safety-related emergency diesel generator (EDG) 12 without performing an adequate engineering evaluation which addressed the suitability of application of the part to the safety-related functions of the EDG and EDG components.
- b. On May 20 and 27, 1997, the licensee continued to install the same type turbo charger blower gasket identified as inadequate on May 13, 1997, in EDGs 13 and 14 without revising the engineering evaluation to support the use of the gasket. As a result, inadequately evaluated nonsafety-related parts continued to be used in safety-related equipment until May 27, 1997.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, the Detroit Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time

specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois,
this 19th day of June 1997