April 18, 2002

Mr. William O'Connor, Jr.
Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI 2 NUCLEAR POWER STATION
NRC INSPECTION REPORT 50-341/02-03(DRP)

Dear Mr. O'Connor:

On March 31, 2002, the NRC completed an inspection at your Fermi 2 Nuclear Power Station. The enclosed report documents inspection findings which were discussed on March 28, 2002, with you, and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on plant operations.

No findings of significance were identified.

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Sincerely,

***/RA/***

Mark A. Ring, Chief
Branch 1
Division of Reactor Projects

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

Enclosure: Inspection Report 50-341/02-03(DRP)

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REGION III

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|---|---|
| Docket No: | 50-341 |
| License No: | DPR-43 |
| Report No: | 50-341/02-03(DRP) |
| Licensee: | Detroit Edison Company |
| Facility: | Enrico Fermi, Unit 2 |
| Location: | 6400 N. Dixie Hwy.<br>Newport, MI 48166 |
| Dates: | February 16 through March 31, 2002 |
| Inspectors: | S. Campbell, Senior Resident Inspector<br>J. Larizza, Resident Inspector |
| Approved by: | Mark Ring, Chief<br>Branch 1<br>Division of Reactor Projects |

## SUMMARY OF FINDINGS

IR 05000341-02-03, on 2/16-3/31/2002, Detroit Edison Company, Fermi 2 Nuclear Power Station.

The inspection was conducted by the resident inspectors. No findings of significance were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the application violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at http://www.nrc.gov/NRR/OVERSIGHT/index.html.

## Report Details

### Plant Status

Fermi 2 operated at or near 100 percent power throughout the inspection period. On March 2, 2002, power was decreased to 65 percent to remove the south reactor feedwater pump from service for planned maintenance. Reactor power was returned to 100 percent on March 3, 2002. On March 9, 2002, power was decreased to 65 percent to perform a control rod swap and planned maintenance on a steam line drain valve. Reactor power was returned to 100 percent on the same day. On March 30, 2002, power was reduced automatically to 55 percent due to the trip of the "A" reactor recirculation motor generator set caused by a generator field ground. Reactor power remained at 55 percent the remainder of the inspection period to perform corrective maintenance on the motor end slip ring of the "A" reactor recirculation motor generator set and to determine the root cause of the generator field ground.

## 1. REACTOR SAFETY

### Cornerstone: Mitigating Systems

1R04 Equipment Alignments (71111.04Q)

b. Inspection Scope

The inspectors conducted a partial walkdown of emergency diesel generator 12 and its related diesel generator service water, diesel generator fuel oil transfer and starting air systems. The inspectors reviewed associated piping and instrumentation drawings, condition assessment resolution documents (CARDs), and the independent lineup verification of operating and surveillance procedures to complete the walkdown. The inspectors used the documents to verify that system components were aligned properly and that no outstanding deficient conditions existed to prevent proper operation of the emergency diesel.

c. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05Q)

a. Inspection Scope

The inspectors toured the following areas to determine whether combustible hazards were present, fire extinguishers were properly filled and tested, the CARDOX units were operable, hose stations were properly maintained, and if the fire hazard analysis drawings were correct:

- Updated Final Safety Analysis Report (UFSAR) Section 9A.4.1.3, Zone 2, Reactor Building Basement Corner Rooms
- UFSAR Section 9A.4.1.6, Zone 5, Reactor Building First Floor

- UFSAR Section 9A.4.1.7, Zone 6, Reactor Building Second Floor
- UFSAR Section 9A.4.2.15, Zone 14, Standby Gas Treatment and Control Center Air Conditioning System Rooms
- UFSAR Section 9A.4.3, Division 1 Residual Heat Removal Complex
- UFSAR Section 9A.4.2.11, Zone 10, Divisions 1 and 2 Battery Rooms

b. Findings

No findings of significance were identified.

1R06 Flood Protection (71111.06)

a. Inspection Scope

The inspectors reviewed risk significant systems and components which are below internal or external flood levels or otherwise susceptible to flooding, to verify that the licensee's flooding mitigation plans and equipment are consistent with the licensee's design requirement.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12Q)

a. Inspection Scope

The inspectors reviewed the system health reports, associated CARDs, white papers for probabilistic risk assessments on conditional probabilities, and the control room unit logs for the following systems to evaluate the characterization of failed structures, systems, and components in the maintenance rule program. The inspectors also evaluated performance goals and performance monitoring.

- Sumps and Drains (G1100)
- Extraction Steam (N3016)

b. Findings

No findings of significance were identified

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed the licensee's lubrication analysis for the Fermi main unit transformer 2A and system service transformer 69, and the requirement to resample the transformer oil within 6 months. The inspectors also reviewed the justification for continued operation to determine if the conditions would place the plant in an unacceptable configuration and to verify that the licensee managed plant risks

adequately.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

.1 Reactor Core Isolation Cooling Room Temperature Switches out of Tolerance

a. Inspection Scope

The inspectors reviewed documents associated with surveillance performed on the high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) system room area temperature monitoring equipment. The function of the room temperature monitors is to detect a leak from the associated HPCI and RCIC system steam piping. The isolation of HPCI and RCIC results when a small steam leak is detected. If allowed to continue without isolation, radiation dose limits could be reached and the associated system equipment could be damaged. The allowable values on the room temperature high signals are set low enough to detect a leak equivalent to 25 gallons per minute.

b. Findings

On March 8, 2002, while performing surveillance 44.020.227, "Nuclear Steam Supply System - HPCI and RCIC Room Area Temperature, Channel 'A' Functional Test," E41N602A and E51N602A (Temperature switch electric: steam leak detection 'A' signal to system isolation and temperature switch electric: steam leak detection RCIC equipment area, respectively) were found out of tolerance high at 185$^{o}$ F. Technical Specification Table 3.3.6.1-1, Functions 3.d and 4.d, require the HPCI Equipment Room Temperature - High and the RCIC Equipment Room Temperature - High, respectively, to be set at less or equal to 162$^{o}$ F.

During the December 2001 Channel "A" Functional Test, the setpoint of the temperature switch was inadvertently set too high. On January 9, 2002, the other channel, "B," was calibrated with no discrepancies. During the calibration of the "B" channel and for the duration of a period of 1 hour and 15 minutes, both channels "A" and "B" were inoperable. Technical Specification 3.5.2, "Emergency Core Cooling System - Operating Action "E" states that when the HPCI system is inoperable an immediate verification of RCIC operability is required. In this case, for a period of 1 hour and 15 minutes both HPCI and RCIC systems were inoperable, requiring the licensee to take actions within 1 hour to place the unit in Startup Mode within 7 hours. This was not done because the licensee at that time did not recognize that channel "A" was out of specification and thus inoperable.

At the close of the inspection period, the licensee had not determined the root cause for the instrument temperature high out of tolerance setting. The inspectors considered this an unresolved item **(URI 50-341/02-003-01)** pending the root cause determination for this issue and the inspectors' review of the associated corrective actions.

.2 Failed Stroke Time of RCIC Suppression Pool Isolation Valve E5150F031

a. Inspection Scope

On March 6, 2002, the licensee conducted a post maintenance test on valve E5150-F031 and found a stroke time of 21.5 seconds which did not meet the acceptance criteria of 21.3 seconds. The inspectors reviewed applicable Technical Specifications, design calculations, and procedures to determine if the operability evaluation documented in CARD 02-10311 was properly justified and the component remained available, such that no unrecognized increase in risk occurred.

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17)

a. Inspection Scope

Equivalent Replacement Evaluation 31882, "Part Number Changes for RCIC System Governor Control Valve Stem and Spacers," was reviewed for adequacy of the evaluation, disposition, and conclusion. The modification was for equipment upgrade. The vendor has made changes to the part numbers and material for the stem and spacers and suggested changing the inside diameter of the valve spring seat.

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed the post maintenance testing surveillance procedures for the following systems:

- Standby Feedwater
- RCIC
- HPCI

The procedures were performed to determine the operability of the systems following preventive maintenance activities. Operability determination was based on system response to simulated initiation signals, pump flows, system pressures, valve stroke times, valve position indications, and pre-established acceptance criteria. The

inspectors reviewed the packages to verify that the tests were adequate for the scope of the maintenance. The inspectors also determined that the tests restored the operational readiness consistent with the design and licensing documents.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors witnessed and reviewed test data for the following surveillance activities conducted to demonstrate that risk-significant structures, systems, and components were capable of performing their intended safety functions. The reviews included, but were not limited to, avoidance of preconditioning, clear acceptance criteria, properly calibrated test equipment, proper procedure performance, control of electrical jumpers, complete test data, Technical Specification and UFSAR compliance, and proper equipment restoration:

- Procedure 24.020.235, Nuclear Steam Supply System - RCIC Steam Line Pressure Division I Functional Test
- Procedure 44.010.143, Division 2 Reactor Protection System - Two-out-of-Four Logic Modules Channel Functional Test
- Procedure 24.202.07, HPCI Vacuum Breaker Test
- Procedure 24.208.03, Division 2 Emergency Equipment Cooling Water Test

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed Temporary Modification 02-0001, which evaluated the installation of monitoring instrumentation onto the HPCI system lubricating oil system and associated valves. Two pressure transducers will measure oil pressure in the HPCI turbine lube oil system and two position transducers will measure valve stem movement of the HPCI turbine stop and control valves. The purpose of the temporary modification is to minimize the setup time for installing the monitoring instrumentation. The inspectors also reviewed procedure MES 12, “Performing Temporary Modifications.”

b. Findings

No findings of significance were identified.

**Cornerstone: Emergency Preparedness**

1EP1 Drill, Exercise, and Actual Events (71114.01)

a. Inspection Scope

The inspectors observed the Blue team respond to an emergency drill on March 19, 2002, that included emergency personnel performance in the Technical Support Center, Emergency Operating Facility, and Control Room Simulator. Further, the inspectors attended the controller critique of the Control Room Simulator and Technical Support Center emergency personnel response to the drill.

b. Findings

No findings of significance were identified.

## 4. OTHER ACTIVITIES (OA)

4OA2 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors reviewed licensee event reports, licensee memoranda, unit logs, and NRC inspection reports to verify the residual heat removal safety system unavailability performance indicator for the fourth quarter of 2001.

b. Findings

No findings of significance were identified.

4OA3 Event Followup (71153)

(Closed) Licensee Event Report 50-341/01002: "Licensed Power Limit Exceeded Due to a Non-Conservative Steam Moisture Carryover Fraction." On September 28, 2001, the licensee determined that a non-conservative bias existed in the reactor heat balance methodology for calculating core thermal power. The main steam moisture carryover fraction used in the heat balance calculation was found to be higher than the actual value. This bias constituted a small portion of thermal power (less than 0.1 percent) but it was possible that Fermi 2, on occasion, might have exceeded its licensed thermal power limit. Based on the small magnitude of the calculation bias and conservatism of power used in safety analysis this condition had low safety significance

As an interim measure, the maximum reactor power level was administratively reduced by three megawatts thermal and later the moisture carryover fraction was changed to zero to eliminate the potential non-conservative bias. The final value will be determined when a review of heat balance terms will be completed during the second quarter of 2002. The cause of this event was attributed to information provided by the vendor as input to the heat balance calculation. A contributing factor was the failure to analyze empirical data obtained on two previous occasions against the input parameters of the heat balance methodology.

The failure to meet the requirement of the thermal power limit in Fermi 2 License Section 2.C(1) is of very low safety significance and constitutes a violation of minor significance that is not subject to enforcement action in accordance with Section IV of the Enforcement Policy. The licensee entered this issue into their corrective action program as CARD 01-13286. Although the corrective actions will remain open until the second quarter of 2002, the inspectors determined that the proposed corrective actions were sufficient to close this item.

4OA5 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. O'Connor and other members of licensee management at the conclusion of the inspection on March 28, 2002. The licensee acknowledged the findings presented. No proprietary information was identified.

KEY POINTS OF CONTACT

Licensee

D. Cobb, Plant Manager
J. Davis, Manager, Nuclear Outage
T. Dong, Manager, Performance Engineering
T. Haberland, Manager, Work Control
D. Hemmele, Shift Manager
H. Higgins, Manager, Radiation Protection
K. Hlavaty, Manager, Nuclear Maintenance
S. Hassoun, Principal Engineer, Licensing
R. Johnson, Supervisor, Nuclear Licensing
A. Lim, Supervisor, Mechanical & Civil
M. McDonough, Engineer, Fire Protection
A. Mann, Manager, Operations
W. O'Connor, Vice President, Nuclear Generation
N. Peterson, Manager, Nuclear Licensing
S. Stasek, Director, Nuclear Assessment

NRC

M. Ring, Chief, Division of Reactor Projects, Branch 1

## LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

| | | |
|---|---|---|
| 50-341/02-003-01 | URI | Setting on the High Pressure Coolant Injection and Reactor Core Isolation Cooling System Room Area Temperature Monitoring Equipment Found out of Tolerance High. |

Closed

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|---|---|---|
| 50-341/01002 | LER | Licensed Power Limit Exceeded Due to a Non-Conservative Steam Moisture Carryover Fraction. |

Discussed

None

## LIST OF ACRONYMS USED

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|---|---|
| CARD | Condition Assessment Resolution Document |
| HPCI | High Pressure Coolant Injection System |
| RCIC | Reactor Core Isolation Cooling System |
| UFSAR | Updated Final Safety Analysis Report |

LIST OF DOCUMENTS REVIEWED

The following documents were selected and reviewed by the inspectors to accomplish the objectives and scope of the inspection and to support any findings.

1R04 Equipment Alignment

| | | |
|---|---|---|
| Procedure 24.307.15 | Emergency Diesel Generator 12 - Start and Load Test | Revision 47 |
| Procedure 24.307.35 | DGSW, DFOT and Starting Air Operability Test - EDG 12 | Revision 42 |

1R05 Fire Protection

| | | |
|---|---|---|
| UFSAR Section 9A.4.1.3 | Reactor Building Basement Corner Rooms, Zone 2, El. 540 Ft and 562 Ft | Revision 11 |
| UFSAR Section 9A.4.1.6 | Reactor Building First Floor, Zone 5, El. 583 Ft 6 In | Revision 11 |
| UFSAR Section 9A.4.1.7 | Reactor Building Second Floor, Zone 6, El. 613 Ft 6 In | Revision 10 |
| UFSAR Section 9A.4.3.1 | Residual Heat Removal Complex | Revision 8 |
| UFSAR Section 9A.4.2.15 | Control Room Ventilation Equipment Room and Standby Gas Treatment Room, Zone 14, El. 677 Ft 6 In | Revision 11 |
| UFSAR Section 9A.4.2.11 | Divisions 1 and 2 Battery Rooms | Revision 10 |
| Drwg 6A721-2401 | Fire Protection Evaluation Reactor Building Subbasement Plan El. 540' 0" | Revision K |
| Drwg 6A721-2403 | Fire Protection Evaluation Reactor and Auxiliary Buildings First Floor Plan El. 583' 6" | Revision O |
| Drwg 6A721-2405 | Fire Protection Evaluation Reactor and Auxiliary Buildings Second Floor Plan El. 613' 6" | Revision Q |
| Drwg 6A721-2409 | Fire Protection Evaluation Reactor and Auxiliary Building Fifth Floor Plan (Elevations 677.5 FT and 684.5 FT) | Revision R |
| Drwg 6A721-2041 | Fire Protection Evaluation Residual Heat Removal Complex (Elevation 590.0 FT) | Revision E |

| | | |
|---|---|---|
| Drwg 6A721-2407 | Fire Protection Evaluation Reactor and Auxiliary Building Third Floor Plan (Elevations 641.5 FT and 643.5 FT) | Revision Q |

1R06 Flood Protection

| | | |
|---|---|---|
| UFSAR Section 3.4.4.4 | Internal Flood Protection | Revision 7 |
| UFSAR Section 9.2.5.3.1.4 | Floods | Revision 10 |
| UFSAR Section 11.7.2.2.5 | Flood Protection | Revision 9 |
| UFSAR Section 15.10.2.2.1 | Analysis of Effects and Consequences of Floods | Revision 6 |
| Regulatory Guide 1.102 | Flood Protection for Nuclear Power Plants | September 1976, Revision 1 |
| AOP20.000.01 | Flooding | Revision 32 |
| Maintenance Procedure 35.000.242 | Barrier Identification Classification | Revision 30 |
| Technical Requirement Manual 3.7.4 | Shore Barriers Protection | Revision 31 |

1R12 Maintenance Rule Implementation

| | | |
|---|---|---|
| CARD 02-11760 | Functional Failure Reviews Were Not Conducted for Valve T4500F601 (NRC Identified) | April 3, 2002 |
| CARD 98-17088 | Failed Local Leak Rate Test (P4400F615) | September 7, 1998 |
| CPEP | CPEP Data for G1100 and N3016 Systems Since January 1998 | |
| CARD 01-19553 | Valve Failed to Close During Performance of 27.702.01 | December 7, 2001 |
| Control Room Logs | Control Room Log Entries for Sumps and Drains (G1100) and Extraction Steam (N3016), Since January 1998 | |
| Maintenance Rule Program Manual | Appendix G, “Maintenance Rule SSC Specific Functions” | Revision 9 |

| | | |
|---|---|---|
| Maintenance Rule Program Manual | Appendix H, “Maintenance Rule Performance Criteria” | Revision 9 |
| Log No. 96-002 | Development of Train and Divisional Level Conditional Probability, Allowed Number of Failures and Out-of Service Hours, and Redundancy Factor Determination | October 2, 1998, Revision 1 |
| Log No. 96-001 | Development of “Conditional Probability for SSCs Modeled in the Fermi 2 PSA” | October 2, 1998, Revision 1 |
| Regulatory Guide 1.160 | Monitoring the Effectiveness of Maintenance at Nuclear Power Plants | March 1997, Revision 2 |
| Regulatory Guide 1.177 | An Approach for Plant-Specific, Risk Informed Decision Making: Technical Specifications | August 1998 |
| NUMARC 93-01 | Nuclear Energy Institute Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants | April 1996 |

1R13 Maintenance Risk Assessment and Emergent Work

| | | |
|---|---|---|
| Report 01L084-20395 | Lubrication Analysis Fermi 2 PP Main Unit Transformer No. 2A | January 24, 2002 |
| Report 02L084-00149 | Lubrication Analysis Fermi 2 PP Main Unit Transformer No. 2A and System Service Transformer No. 69 | February 22, 2002 |
| Report 01L084-20412 | Lubrication Analysis Fermi 2 PP System Service Transformer No. 69 | January 24, 2002 |
| CARD 02-11799 | Transformer 2A and SS 69 Have Exceeded the NEIL Limits | February 25, 2002 |

1R15 Operability Evaluations

| | | |
|---|---|---|
| CARD 02-13570 | 44.020.227 Tables 1 and 2 Found Greater than the Required Limit | March 8, 2002 |
| TS Table 3.3.6.1-1 Function 3.d | Primary Containment Isolation Instrumentation HPCI Equipment Room Temperature High | Amendment 134 |
| TS Table 3.3.6.1-1 Function 4.d | Primary Containment Isolation Instrumentation RCIC Equipment Room Temperature High | Amendment 134 |
| TS 3.5.1 | ECCS -Operating Action E | Amendment 134 |

| | | |
|---|---|---|
| CARD 02-10311 | E5150F031 Stroke Time Out of Tolerance | March 6, 2002 |
| Operability Evaluation | Operability Justification for E5150F031 | March 6, 2002 |
| Procedure 24.206.01 | RCIC System Pump and Valve Operability Test | Revision 51 |
| DC-2712 | Design Specification of Motor Operated Valve Stroke | December 29, 1986 |
| GE Spec 22A1354AR | Reactor Core Isolation Cooling System | April 13, 2002 |
| WR E530020100 | RCIC Torus Suction Inboard Isolation Valve | March 5, 2002 |

1R17 Permanent Plant Modifications

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|---|---|---|
| Equivalent Replacement Evaluation ERE 31882 | Part Number Changes for RCIC Governor Control Valve Stem and Spacers | Revision 0 |

1R19 Post Maintenance Testing

| | | |
|---|---|---|
| Procedure 24.202.01 | HPCI Pump Time Response and Operability Test at 1025 PSI | Revision 74 |
| Procedure 24.202.01 Temporary Change Notice | TCN's 10835 and 10836 | |
| Procedure 24.206.01 | RCIC System Pump Operability and Valve Test at 1000 psig | Revision 51 |
| Procedure 24.107.03 | SBFW Pump and Valve Operability and Lineup Verification Test | Revision 30 |

1R22 Surveillance Testing

| | | |
|---|---|---|
| Procedure 44.020.235 | NSSS - RCIC Steam Line Pressure Division I Functional Test. | Revision 29 |
| TSSR 3.3.6.1.2 | Perform Channel Functional Test | Amendment 134 |
| TSSR 3.3.6.1.3 | Verify the Trip Unit Setpoint | Amendment 134 |

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|---|---|---|
| TS Table 3.3.6.1-1 Function 4.b. | RCIC Steam Supply Line Pressure - Low | Amendment 134 |
| Procedure 44.010.143 | Div 2 RPS - Two-out-of-Four Logic Modules Channel Functional Test. | Revision 3 |
| TSSR 3.3.1.1.12 | Perform Channel Functional Test | Amendment 134 |
| TS Table 3.3.1.1-1, Function 2.e. | Two-out-of-Four Voter | Amendment 139 |
| Procedure 24.202.07 | HPCI Vacuum Breaker Test | Revision 28 |
| Procedure 24.208.03 | Division 2 EESW Pump & Valve Operability Test | Revision 42 |

1R23 Temporary Plant Modifications

| | | |
|---|---|---|
| Temp Mod 02-0001 | Install Monitoring Instrumentation Onto HPCI Lube Oil System and HPCI Valves E4100F067 and E5100F068 | Revision 0 |

1EP1 Drill, Exercise, and Actual Events

| | | |
|---|---|---|
| Scenario 32 Drill Package | Sequence of Events | March 14, 2002 |
| CARD 02-13073 | RERP Objectives not Met During the March 19, 2002 Drill | April 5, 2002 |
| Scenario 32 | Drill Exercise Critique Summary (Blue Team) | April 5, 2002 |
| | NRC Performance Indicator (RERP) Documentation Form | April 2, 2002 |

4OA2 Performance Indicator Verification

| | | |
|---|---|---|
| | 4Q/2001 Performance Indicators - Fermi 2 | |
| | Control Room Logs from October 1 through December 31, 2001 | |
| Nuclear Generation Memo | Performance Engineering Group NRC Performance Indicator Fourth Quarter 2001 Data Submittal | January 15, 2002 |

| | | |
|---|---|---|
| Log 01-013 | Performance Evaluation Program Evaluation Sheet NRC Performance Indicator Data Submittal for 2001 Q4 | January 10, 2002 |
| NEI 99-02 | Regulatory Assessment Performance Indicator Guideline | Revision 2 |