



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

June 7, 2019

Mr. Paul Fessler, Senior VP
and Chief Nuclear Officer
DTE Energy Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION AT THE FERMI POWER
PLANT, UNIT 2

Dear Mr. Fessler:

This letter is to request information to support our scheduled Problem Identification and Resolution (PI&R) inspection beginning July 29, 2019, at your Fermi Power Plant, Unit 2 (Fermi-2). This inspection will be performed in accordance with the NRC baseline Inspection Procedure 71152.

Experience has shown that these inspections are extremely resource intensive both for the NRC inspectors and the utility staff. In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a list of documents required for the inspection.

The documents requested are copies of condition reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. The information requested prior to the inspection may be provided in electronic format and should be ready for NRC review by July 12, 2019. Mr. Raymond Ng, the Lead Inspector, will contact your staff to determine the best method of providing the requested information.

If there are any questions about the material requested, or the inspection in general, please contact Mr. Ng at 630-829-9574 or raymond.ng@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011.

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Eric Duncan, Chief
Branch 4
Division of Reactor Projects

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

Enclosure:
Requested Information to Support
PI&R Inspection

cc: Distribution via LISTSERV®

Letter to Paul Fessler from Eric Duncan dated June 7, 2019

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION AT THE FERMI POWER
PLANT, UNIT 2

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Requested Information to Support Problem Identification and Resolution Inspection

Please provide the information in electronic format. Unless otherwise specified, the time frame for the requested information is for the period of April 1, 2017, through the time the data request is processed. Please label any electronic files with file content information. In the case of a request for a list of condition reports, the list should be sortable electronically.

In addition, inspectors will require computer access to the corrective action program (CAP) database while on site.

PROGRAM DOCUMENTS

1. Copies of current administrative procedures associated with the corrective action program. This should include procedures related to: (1) corrective action process; (2) operating experience program; (3) self-assessment program; (4) maintenance rule program; (5) operability determination process; (6) degraded/non-conforming condition process (e.g., RIS 2005–20); (7) system health process or equivalent equipment reliability improvement programs; and (8) operational decision-making (ODMI) process.
2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure.
3. Description of any substantive changes made to the CAP since the last Problem Identification and Resolution (PI&R) Inspection (June 2017). Please include the effective date with each listed change.

ASSESSMENTS

4. A copy of all Quality Assurance (QA) audits of the corrective action program.
5. A copy of all self-assessments and associated condition reports generated in preparation for this PI&R inspection.
6. A list of all other QA audits completed.
7. The schedule of all future QA audits.
8. A copy of all other completed CAP self-assessments and the plan/schedule for future CAP self-assessments.
9. A chronological list of department self-assessments completed (include date completed).
10. A list of Condition Assessment Resolution Documents (CARDs) written for findings or concerns identified in self-assessments and audits. Include a short description/title of the finding, its status, and include a cross-reference to the audit or self-assessment number.

Enclosure

CORRECTIVE ACTION DOCUMENTS

11. A list of completed root cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the root cause package, to the documents and/or CARDS directing and tracking the actions.
12. A list of completed apparent cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the apparent cause package, to the documents and/or CARDS directing and tracking the actions.
13. A list of completed common cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the common cause package, to the documents and/or CARDS directing and tracking the actions.
14. A list of all open CARDS at the time this information request is processed. Include CARD number, the date initiated, a brief description/title, system affected if any, anticipated completion date, if available, and whether there is an associated operability evaluation. This list should be sortable by responsible department and listed in order of initiation date (oldest listed first).
15. A list of all CARDS closed since April 1, 2017. Include those CARDS that were initiated before April 1, 2017, but closed during this inspection period. Include CARD number, a brief description/title, date closed, assigned organization, system affected and whether there was an associated operability evaluation. This list should be sortable by responsible department and listed in order of initiation date (oldest listed first).
16. A list of open corrective actions at the time this information request is processed. Include significance/priority level, a brief description/title, initiating date and due date. The list should also include the number of due date extensions and be sortable by the responsible department.
17. A list of CARDS generated by the corporate office that involve or affect Fermi-2's operation. Include significance level, the date initiated, a brief description/title, site(s) affected, system affected, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed).
18. A list of completed effectiveness reviews with a brief description of the results. Include a cross-reference to the CARDS for which the effectiveness review was conducted and, if applicable, CARD numbers documenting any additional follow-up actions.
19. A list of CARDS initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance/priority level, system affected, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed). Include a cross-reference to the CARD or evaluation that generated the original corrective action.

20. A copy of any performance reports or indicators used to track CAP effectiveness for the past 24 months. The most recent data and end-of-quarter data will suffice; monthly reports are not required.
21. A data table (or similar format) showing the total number of CARDS generated per year since 2013 sortable by department (i.e. operations, engineering, security etc.).
22. A data table showing the number of issues identified externally (NRC, other industry organizations, etc.) per year as compared to internally since 2013.

TRENDS

23. A list of CARDS initiated for trends. Include the date initiated, a brief description/title, significance/priority level, and status (if closed include date closed; if open, include scheduled date to be closed).
24. Copies of any completed trend reports for CARDS. Quarterly trend reports are acceptable; copies of monthly reports are not required.
25. Copies of all apparent, common and/or root cause evaluations regarding adverse human performance trends.

OPERATING EXPERIENCE

26. A copy of the most recent operating experience program effectiveness review.
27. A list of CARDS initiated to evaluate industry and NRC operating experience, and NRC generic communications (e.g. bulletins, information notices, generic letters, etc.). Include date the CARD was initiated, a brief description/title, and the status (if closed include date closed; if open, include scheduled date to be closed).

SYSTEMS AND COMPONENTS

28. A list of the top ten risk significant systems and top ten risk significant components.
29. A list of operability determinations/evaluations that were opened and evaluated since April 1, 2017. Include a brief description/title, date initiated, date closed or date scheduled to be closed. Also include any open operability evaluations that were initiated prior to April 1, 2017.
30. Cause analysis, corrective actions documents, health reports, and trend analysis for systems and components considered Maintenance Rule (a)(1) since April 1, 2017. Provide this information starting one year earlier from when the system or component entered (a)(1) status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status. For recurring reports, quarterly reports are sufficient; monthly reports are not required.
31. A list of temporary modifications that were installed since April 1, 2017, with a brief description/title, installation date, and status. Include any in-place temporary modifications that were installed prior to April 1, 2017.

SCWE

32. Results of completed safety culture/safety conscious work environment surveys or self-assessments. Include a reference to associated CARD and status of the CARD actions. Also include schedules/plans for future surveys.

REGULATORY ISSUES

33. A list of CARDS for issues (findings, violations, etc.) documented in NRC inspection reports. Include the CARD number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
34. A list of CARDS for licensee-identified violations that have been documented in NRC inspection reports. Include the CARD number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
35. A list of CARDS associated with NRC identified issues that were not documented in inspection reports. Include the CARD number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
36. A list of degraded/non-conforming conditions. Include the CARD number, brief description/title, date initiated and date closed or projected closeout date. Include currently open issues that were identified prior to April 1, 2017.
37. A list of current control room deficiencies and operator work-arounds, sorted by priority, with a brief description/title and corresponding CARD and/or work order number.

5-YEAR REVIEW

38. A list of CARDS regarding Emergency Diesel Generator system leakages (oil or water) that have been generated since April 1, 2014. Include the CARD number, brief description/title, level of evaluation (i.e. root cause, apparent cause, common cause etc.), date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).
39. A list of CARDS regarding materials related issues (commercial dedication issues, procurement issues, parts storage issues, etc.) that have been generated since April 1, 2014. Include the CARD number, brief description/title, level of evaluation (i.e. root cause, apparent cause, common cause, etc.), date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).

ADMIN

40. A copy of the latest plant organizational chart and phone listing.
41. Scheduled dates, times, and location for all meetings associated with implementing the CAP (e.g. CARD screening meetings, corrective action review board meetings). Include work order screening/assessment meetings.

Documents requested to be available on-site during the inspection:

- a. Updated Final Safety Analysis Report.
- b. Technical Specifications and Bases.
- c. Procedures and procedure index.
- d. A copy of the QA manual.
- e. A list of issues identified to the ECP/ombudsman and the actions taken for resolution.
- f. A list of the codes used in the CAP with their descriptions.
- g. A copy of the latest independent/offsite organization review of safety culture/safety conscious work environment and internal equivalent assessments if not provided as part of the requested data package.