

Detroit
Edison

Edward Hines

June 9, 1980
EF2-49,000

Mr. G. Fiorelli, Chief
Reactor Construction and Engineering
Support Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Supplemental Response to Inspection Report No. 50-341/79-25.

Dear Mr. Fiorelli:

This letter contains the additional information concerning actions taken on the Fermi II Project to control conditions adverse to quality as requested in your letter dated March 24, 1980. The attachment to this letter provides a summarized history of actions taken relative to activities identified in your Inspection Reports as being in noncompliance with 10CFR50 Appendix B, Criterion XVI, "Corrective Action".

There are four basic procedures which have been developed for use on the Fermi II Project to provide instructions for identifying causes of problems and/or obtaining corrective action to prevent recurrence of significant conditions adverse to quality. These procedures have been generated and revised when determined necessary to improve and assure adequate corrective action. Following is a description of the procedures, or portions of the procedures, which pertain to this subject:

1. Deviation Disposition Request (DDR), Procedure No. AP-VII-02. In general, this procedure describes the methods used to identify, document, control, disposition, provide corrective action, notify affected personnel and close out deviations. More specifically, the procedure requires the Contractor/Daniel Engineer responsible for dispositioning the deviation to determine the cause of the nonconformance. A statement is to be provided on the DDR form reflecting the cause and describing the action to be taken to prevent or minimize recurrence of similar types of nonconformances. In the event preventive type corrective action is not applicable, it is to be so noted on the form with a statement of justification. The Contractor/Daniel QC Manager is responsible to assure that the corrective action statement is appropriate and that implementation of the action is capable of being verified. Prior to closing a DDR, the Quality representative verifying completion of the disposition is responsible to assure that the corrective action has been accomplished or is in progress. Supporting documentation for implementation of corrective action is to be referenced or attached to the form.

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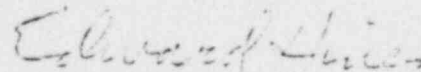
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2. Corrective Action, Procedure No. AP-VII-08. This procedure describes the method used to identify and report observed or potential conditions adverse to quality. It provides for determining the cause and obtaining positive corrective action to preclude or minimize future occurrences. Quality problems identified during surveillance, inspection, or by review of DDR's are reported on a Corrective Action Report form (the procedure requires review of DDR's to determine existence of general quality trends). The reports are sent to the responsible personnel for action. Copies of the reports are distributed, as a minimum, to the Daniel Project Manager, Detroit Edison Project Superintendent, QA Manager, and responsible Discipline Manager. Quality personnel are required to verify adequate action has been taken to correct the adverse condition prior to closing.
3. Project Audit Response, Procedure No. AP-II-07. This procedure provides a standard format for response to Project Audit Finding Reports. It includes monitoring of open status by an individual (Project Audit Coordinator) who reports to the Daniel Project Manager. If responses are not submitted within the time prescribed, the Project Audit Coordinator notifies the responsible Daniel Discipline Manager and Daniel Project Manager of the delinquent response for resolution.
4. Stop/Start Work Authority, Procedure No. AP-II-04. This procedure identifies the Project Personnel who have authority to issue stop work orders and describes the method to be used to implement this action. Stop work action is provided if the controls discussed previously are insufficient in obtaining adequate corrective action.
5. Reorganization of Site Quality Organization. The site quality organizations of Edison and Daniel have been combined to provide a more effective organization. This additional effectiveness will be reflected in corrective action as well as other areas associated with quality.

All actions taken to provide effective corrective action are closely monitored and additional changes are made as needed.

We trust this letter addresses the additional concerns indicated in your letter of March 24, 1980. We will be glad to discuss any further concerns you may have.

Very truly yours,



EH/HAW/pn
Attachment

Mr. G. Fiorelli
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cc: Mr. Victor Stello, Jr., Director
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Division of Reactor Inspection Programs
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Washington D.C. 20555

Mr. Bruce Little, Resident Inspector
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