

NOTICE OF VIOLATION

Detroit Edison Company  
Fermi 2

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

As a result of the inspection conducted on April 11 through June 5, 1989 and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedures for NRC Enforcement Actions (1988), the following violation was identified:

10 CFR 50, Appendix B, Criterion III, "Design Control," states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis . . . for those structures, systems, and components . . . are correctly translated into specifications, drawings, procedures, and instructions."

- a. 10 CFR 50.55a(h), states in part, "For construction permits issued after January 1, 1971, protection systems shall meet the requirements set forth in editions or revisions of the Institute of Electrical and Electronics Engineers Standard: "Criteria for Protection Systems for Nuclear Power Generating Stations," (IEEE-279) in effect on the formal docket date of the application for a construction permit . . . ."

Section 1 of IEEE-279 (1971), states in part, "These criteria establish minimum requirements for the safety related functional performance and reliability of protection systems . . ." Section 4.17, states in part, "Manual Initiation. The protection system shall include means for manual initiation of each protective action at the system level . . . ."

Contrary to above, the manual initiation function of sixteen Containment Nitrogen Inerting and Purging system isolation valves was designed and installed as balance-of-plant instead of safety-related.

- b. 10 CFR 50, Appendix A, Criterion 2, "Design bases for protection against natural phenomena," states in part, "Structure, systems, and components important to safety shall be designed to withstand the effects of . . . earthquakes . . . without loss of capability to perform their safety functions . . . ."

Fermi Updated Final Safety Analysis Report, Appendix A, Section A.1.52, commits the licensee to designing the Control Center Heating, Ventilating, and Air Conditioning (CCHVAC) system ductwork in accordance with Oak Ridge National Laboratory standard, ORNL-NSIC-65, Section 2.8.

Section 2.8.1 of ORNL-NSIC-65 requires 16 gauge sheet metal for ductwork experiencing a negative pressure of 17.8 inches of water.

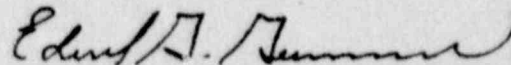
Contrary to above, the CCHVAC ductwork on the suction side of the recirculation fans was not designed in accordance with OPN NSIC-65 in that the ductwork was constructed of 18 gauge sheet metal instead of the required 16 gauge sheet metal for the negative pressure that can be experienced. Additionally, the seismic analysis for this ductwork did not consider the negative pressure that can be experienced.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

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Dated \_\_\_\_\_



Edward G. Greenman, Director  
Division of Reactor Projects