

Detroit  
Edison

William S. Orser  
Vice President  
Nuclear Operations

Fermi 2  
6400 North Dixie Highway  
Newport, Michigan 48166  
(313) 586-5201



Nuclear  
Generation

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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Reference: Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43

Subject: Accountability Action Plan

Recently we have had an increase in personnel errors at Fermi 2. Due to management concern, an accountability meeting was held on December 21, 1989 to discuss the root causes and develop an action plan. An extensive three phase action plan was outlined. The first step involves verifying that there are no problems with surveillance testing or return to service of safety-related equipment during the outage similar to personnel errors we have recently noted. The second phase entails looking at some of our administrative controls to determine if enhancements should be made to prevent recurrence and the third portion addresses the broader question of the underlying personnel deficiency issues. The Quality Assurance organization will perform an oversight function for all phases of the Action Plan.

This plan was discussed with Mr. Robert Defayette, NRC Region III, and Mr. John Stang, NRR Project Manager, in telephone calls on December 21, 1989. In a conference call on December 23, Mr. William Axelson, NRC Region III, requested that Detroit Edison send a letter describing the plan. This letter will describe the actions included in the plan and the QA oversight function.

The first step is aimed at detecting whether there are any other problems in the area of surveillance or return to service testing of safety related equipment. Of the recent events, three involved problems in this area. The actions in this phase are:

- 1) Review of the log pertaining to Limiting Condition for Operations (LCO's) to identify and specify any further required return to service testing that may need to be done.
- 2) Review of all LCO's generated and closed during the first refueling outage for adequate return to service testing.

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- 3) Review of all outage, routine and scram recovery Surveillance Test Packages generated during or since the outage which have been completed but which noted problems encountered during completion. These will be reviewed to determine whether required additional testing was properly completed.
- 4) Review for completeness a sample of other properly completed surveillance tests performed during the outage.
- 5) Review the current Abnormal Lineup Sheets to ensure that all appropriate items are in the LCO log.
- 6) Review all open work packages for safety related equipment which are craft complete but for which the paperwork is not completely through the review cycle and vaulted for any operability concerns.

The second step of the action plan is to review how the associated administrative processes can be simplified and improved. The programs included for improvement are:

- 1) The LCO program.
- 2) The Abnormal Lineup Sheet program.
- 3) The Surveillance Scheduling and Tracking Program, including the current practice of using partially completed surveillance tests.

The third step of the action plan addresses the personnel deficiency issues underlying the problems. The thrust of this portion of the action plan is to promote professionalism and responsibility on the part of all plant personnel, especially supervision, for all activities whether they be safety-related or balance-of-plant. The actions included in this portion of the plan complement programs already in place and will emphasize what being a professional means. These actions are:

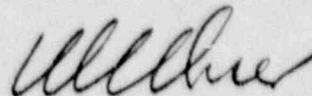
- 1) Distribute the minutes from the December 21 management accountability meeting to all supervisors.
- 2) Conduct and/or gather the critiques or accountability meeting results for each of the recent events to ensure actions identified as necessary are completed. This information will be provided to the QA organization for use in their oversight activities.
- 3) Develop and present a videotape to all plant personnel emphasizing the importance of professionalism and what it involves, including personnel accountability, followup and simplification.

The Quality Assurance oversight of the action plan will also include 3 phases. The first phase will be an assessment of the action plan, including its feasibility, timeliness and conformance to management guidelines and goals. Phase 2 will assess the plan implementation including personnel familiarization with the plan, supervisory priority assigned to the plan and implementation of the specific actions. Phase 3 will be an overall performance assessment of the results of the plan. Personnel performance in safety-related and balance-of-plant activities will be assessed by looking at indicators such as timely performance of surveillance tests and personnel errors resulting in reduced plant performance and reportable events. Performance in all major areas will be assessed, with some emphasis given to the Maintenance and Operations areas and supervisory performance. Personnel attitudes will be assessed and reviews performed by other agencies will be evaluated to determine if the results of the action plan are readily apparent.

We believe this action plan will serve to supplement and reinforce existing programs. It will focus attention on the immediate problem areas and also the underlying causes. By focusing on professionalism, accountability, followup and simplification it will serve to improve performance of personnel in all activities throughout the plant.

If you have any questions, please contact Lynne Goodman at (313) 586-4211.

Sincerely,



cc: A. B. Davis  
R. W. Defayette  
W. G. Rogers  
J. F. Stang