NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2

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

As result of the inspection conducted on May 30 through November 1, 1989 and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1989), the following violations were identified:

A. 10 CFR 50.59(a)(1) states in part "The holder of a license ... may make changes in the facility as described in the safety analysis report ... unless the proposed change ... involves a change in the technical specifications incorporated in the license or an unreviewed safety question."

10 CFR 50.59 (a)(2) states in part "A proposed change shall be deemed to involve an unreviewed safety question if the probability of ... the consequences of an accident ... previously evaluated in the safety analysis report may be increased...."

10 CFR 50.59 (b)(1) states in part "the licensee shall maintain records of changes in the facility ... These records must include a written safety evaluation which provides the bases for the determination that the change ... does not involve an unreviewed safety question."

10 CFR 50 Appendix B Criterion XVI, "Corrective Action," states in part "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected."

Contrary to the above:

a. On March 30, 1988 engineering personnel failed to identify an unreviewed safety question in that the evaluation of removal of the residual heat removal minimum flow valve from service under SE 88-0074 did not conclude that this action rendered the residual heat removal and low pressure coolant injection function of that residual heat removal division inoperable.

b. On February 4, 1988 engineering personnel failed to evaluate a change to the facility as described in the safety analysis report, addition of electrical load to the division 2 safety related battery under EDP 7964, to the criteria associated with an unreviewed safety question.

c. On July 17, 1989 the licensee failed to evaluate a change to the facility as described in the safety analysis report, replacement of a recorder with digital fluke meters to monitor circulating water temperature in the control room panels, to the criteria associated with an unreviewed safety question.

d. On February 4, 1989, engineering personnel failed to establish adequate measures to correct a condition adverse to quality and changed the facility as described in the safety analysis report without identifying an unreviewed safety question in that the disposition of railcar door design deficiencies in deviation event report 89-0219 improperly concluded that the consequences of a flood, a previously evaluated accident, would not increase with these deficiencies present.

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

B. 10CFR 50, Appendix B, Criterion V,"Instructions, Procedures, and Drawings," states in part "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings...."

Procedure FIP-CA1-01, "Deviation and Corrective Action Reporting," Section 5.9 states:

> The responsible organization is responsible for:
>
> 5.9.1 Completing required investigations.
> 5.9.2 Recommending remedial and corrective actions to prevent recurrence.
> 5.9.3 Assigning actions to other organizations as required, mutually agreeing on due dates.

Procedure FIP-CA1-01, "Deviation and Corrective Action Reporting," Section 6.1.18 states:

> Submit the following for review to QA and PS.
>
> 1. Results of investigation and corrective action.
> 2. If DER is not ready for closeout retain original and include a plan with assigned responsibilities and due dates for all remaining actions.
> 3. If action cannot be completed by the due date, an extension request may be submitted with suitable justification and a revised schedule. This will be reviewed by Director, Plant Safety and an extension granted, if acceptable.

Procedure FIP-OP1-02, "Temporary Modification," section 1.0 (The Purpose) states "To prescribe administrative controls for temporary minor alterations made to plant equipment that do not conform with approved drawings and design documents. These alterations are temporary in nature and are expected to be installed for a short duration."

Procedure FIP-OP1-02, "Temporary Modification," section 6.1.5 states "Perform a Preliminary Evaluation and, if necessary, a Safety Evaluation in accordance with FIP-SR1-01."

Procedure FMD CA1, "Evaluation and Corrective Action," section 2.1.1 defined "Conditions Adverse to Quality" in part as "...equipment deviations from approved specifications, codes, regulations, orders, drawings, standards...."

Procedure FIP-CA1-01,"Deviation and Corrective Action Reporting," section 2.1 and 6.1.1 require the initiation of a DER for a condition adverse to quality.

Contrary to the above:

a. In January 1989 documented procedures prescribing activities affecting quality were not properly implemented in that the licensee performed a change to the facility by installing three digital fluke meters in the main control room panels without performing the required safety evaluations.

b. Documented procedures prescribing activities affecting quality were not properly implemented in that the responsible organization for DER 89-108 did not accomplish the corrective actions within the prescribed time frames of the deviation event report.

c. Documented procedures prescribing activities affecting quality were not properly implemented in that the personnel other that the director of plant safety granted corrective action extensions for DER 89-108.

d. Documented procedures prescribing activities affecting quality were not properly implemented in that the responsible organization for DER 89-108 did not recommend corrective actions for the operating authority even though the operating authority authorized installation of the digital fluke meters.

e. The procedure governing the deviation event reporting program inadequately prescribed activities affecting quality in that it did not prescribe what constituted "adequate justification" and what was the format for submittal, review and approval/rejection of extension requests.

f. On July 12, 1989 the licensee failed to initiate a deviation event report for a condition adverse to quality in that a report was not written when the C mechanical draft cooling tower fan was prematurely declared operable due to an improper safety review of temporary modification 89-0021.

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.

JAN 2 3 1990

Dated

Edward G. Greenman, Director
Division of Reactor Projects