

THE DETROIT EDISON COMPANY  
QUALITY ASSURANCE DEPARTMENT  
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/81-07

Supplement to Response Dated August 20, 1981

Inspection at: Enrico Fermi 2 Site, Monroe, Michigan

Inspection Conducted: June 15-19, 1981

Prepared by:

H.A. Walker

H.A. Walker, Supervisor  
Construction Quality Assurance

Approved by:

T.A. Alessi

T.A. Alessi, Director  
Project Quality Assurance

Response to NRC Inspection Report #50-341/81-07

Statement of Violation 81-07, Appendix A (81-07-01)

Contrary to the requirements of 10CFR50, Appendix B, Criterion IX, the Enrico Fermi 2 Final Safety Analysis Report Section B17.1.9, and the ASME Boiler and Pressure Vessel Code, Section III, 1971 Edition, Winter 1971 Addenda, Appendix IX, Paragraph IX-3325, ASTM E142 penetramers were not used to check the radiographic technique employed on shop fabricated welds.

Corrective Action taken and the Results Achieved

A review of Dravo radiographic film supplied to the Fermi 2 Project has been completed. Over 4,000 film packages were reviewed and approximately 2,600 were found to have the problem with the improper penetrometer. The problem film have been grouped per QA Level and ASME Code class and a DDR has been written for each group. Disposition for the welds will be based on the following criteria:

1. Radiographic Film Packages for Weld End Build ups, that have been re-radiographed due to incorporation into final welds, are acceptable.
2. Paragraph IX-3334.5 of Appendix IX of the 1971 Section III, allows the slit to be defined in lieu of the 2T hole for the numbers 5, 7, and 10 penetrometer. All radiographic film packages where the slit is visible on the number 5, 7, and 10 ASME penetrameters meet the intent of the Code and are acceptable.
3. Equivalent penetrometer sensitivity shall be calculated for radiographic film packages not meeting criteria 1 or 2. If the calculated equivalent sensitivity value for the ASME penetrometer compares with or is less than the maximum ASTM penetrometer sensitivity value, the radiographic film package meets the intent of the Code and is acceptable.
4. Radiographic film packages not meeting the requirements of Criterion 1, 2, and 3 shall be referred to Dravo for further consideration and disposition. i.e.: Re-radiograph or Code Inquiry.

Corrective Action Taken to Avoid Further Noncompliances

This problem has been noted on Dravo radiographic film only. Dravo has been notified of the problem and a review of Dravo radiographic film indicates that the problem has not occurred since 1977.

Date When Full Compliance Will Be Achieved

A review of Dravo supplied radiographic film has been completed and discrepancies have been documented. Grouping and evaluation of the problem film has been completed. Disposition has been determined for film in the first three categories noted above. Sixteen safety related welds were found to be in category 4 and have been referred to Dravo for disposition. Required action on these items should be completed by December 1, 1981.

The foregoing statements are based on facts  
and circumstances which are true and accurate  
to the best of my knowledge and belief.

H. A. Walker  
H.A. Walker, Supervisor  
Construction Quality Assurance

Subscribed and sworn

to before me this

30th day

of September, 1981.

Jennie Kyko  
JENNIE KYKO  
Notary Public, Monroe County, MI  
My Commission Expires Nov. 26, 1984



Donald A. Wells  
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July 22, 1980  
EF2-54,129

Mr. C. E. Norelius, Acting Director  
Division of Engineering and Technical  
Inspection  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Norelius:

Request for Extension of Time to Respond to NRC  
Inspection Report 50-341/81-07

This letter is to document the granting of a request by Detroit Edison for additional time to respond to NRC Inspection Report 50-341/81-07. This report covers the inspection conducted by Mr. K. D. Ward of NRC Region III at the Fermi 2 Site on June 16-19, 1981. We requested the extension to allow adequate time to complete our investigation. To reply within the allotted time would probably require the submittal of additional information at a later date.

Mr. J. Smith of your organization indicated by telephone on July 20, 1981, that the request for additional time was acceptable to the NRC. The response is now due on or before August 20, 1981.

Very truly yours,

HAW:mb

cc: Mr. Victor Stello, Jr., Director  
Office of Inspection and Enforcement

Mr. Bruce Little, Resident Inspector

AUG 6 1981