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Nuclear  
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April 16, 1993  
NRC-93-0048

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

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) NRC Inspection Report No. 50-341/93004 dated March 17, 1993

Subject: Reply to Notice of Violation 93004-02

Attached is Detroit Edison's response to Notice of Violation contained in Reference 2. This violation was for failure to report an Engineered Safety Feature (ESF) actuation within the four hour notification requirement. This violation occurred February 25, 1993.

The violation noted did not result in a condition which was adverse to safety. Nevertheless, as a result of this violation, Detroit Edison has taken actions to ensure continued compliance with 10 CFR 50.72. Actions taken to address this violation are detailed in the Enclosure to this letter.

The Notice of Violation referenced this violation as item 50-341/93004-01 (DRP). The text of Inspection Report 93004 referenced 341/93004-02 (DRP). For documentation purposes, the NRC identification number 93004-02 will be utilized.

Should you have any questions regarding this response, please contact Elizabeth A. Hare, Senior Compliance Engineer at (313) 585-1427.

Sincerely,

Enclosure

- cc: T. G. Colburn  
A. B. Davis  
M. P. Phillips  
W. J. Kropp  
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Statement of Violation 93004-02:

"10 CFR 50.72 (b)(2)(ii) requires the licensee to notify the NRC within four hours of the occurrence of any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF). At 4:48 p.m. (EST) on February 25, 1993, the Drywell Pneumatic Primary Containment Outboard Isolation valve, T49F468 closed due to a blown fuse.

Contrary to the above, this Engineered Safety Feature (ESF) actuation was not reported to the NRC until February 26, at 4:37 p.m. (EST) which was approximately twenty hours beyond the four hour notification requirement."

Reason For The Violation:

The root cause of the violation was a general belief by all personnel involved that only Engineered Safety Feature (ESF) actuations caused by actual logic actuation were reportable. This specific event was caused by loss of power to the solenoid valve for the Drywell Pneumatic Primary Containment Outboard Isolation valve T-9-F468. Therefore, the origination of the actuation was from a component deenergization and not the ESF actuation logic. Additionally, Procedure FIP-RA1-02, "Notifications", contained unclear examples with respect to reportability. Based on this procedure and communications with other plant organizations, the operations shift concluded that this portion of the event was non-reportable.

Draft reportability guidance was used during a discussion with the NRC the day following the event to justify why Detroit Edison believed event was not reportable. In the future, licensing staff will refrain from using draft guidance as a basis for not reporting an event.

Corrective Actions Taken To Avoid Further Violations:

On March 3, 1993, Plant Operations management reinforced that any event for which reportability is questionable shall be reported per 10 CFR 50.72. On March 5, 1993, an Accountability Meeting was held with individuals involved and plant management to discuss LER 93-005, "ESF Actuation Due to Failed Indicating Lamp." Discussion included the failure to make a timely four hour notification and the corrective actions required to prevent recurrence.

Procedure FIP-RA1-02, "Notifications" will be revised to state that actuation of an ESF component or system regardless of actuation origin is reportable. This procedure revision will be required reading for the Nuclear Shift Supervisor, Nuclear Assistant Shift Supervisors, Shift Technical Advisors, and the licensing staff. This will ensure that the key individuals involved in reportability determinations are cognizant of this requirement.

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Date When Full Compliance will Be Achieved:

Detroit Edison is currently in compliance with 10 CFR 50.72. This corrective action to prevent recurrence will ensure that full compliance is maintained. The procedure will be revised by May 21, 1993.