

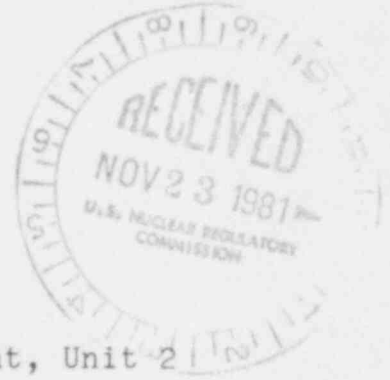
**Detroit
Edison**

Harry Tauber
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November 18, 1981
EF2 - 55,344

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Eisenhut:

Reference: Enrico Fermi Atomic Power Plant, Unit 2
NRC Docket No. 50-341

Subject: Qualification of Inspection, Examination
and Testing and Audit Personnel
(Generic Letter 81-01)

This letter is in response to your Generic Letter 81-01.

1. Regulatory Guide 1.146

The established Design and Construction QA program, which predates the development of ANSI N45.2.23, is not committed to be in compliance with Reg. Guide 1.146. However, the adopted practices for the training and qualification of auditor personnel meet the requirements of the ANSI standard.

The Operations QA program will comply with the requirements of Reg. Guide 1.146.

2. Regulatory Guide 1.58, Rev. 1

The established Design and Construction QA program, which predates the development of ANSI N45.2.6-1973, is not committed to be in compliance with Reg. Guide 1.58. Rather, it meets the intent of the endorsed ANSI standard.

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Inspection and examination personnel of site contractors have been qualified to the requirements of ANSI N45.2.6-1973. Present inspection personnel of Project Quality Assurance who perform first level inspection are also qualified to the same standard.

Edison test personnel, who are part of the Startup Organization and who perform the Checkout and Initial Operations and Preoperational testing, have been qualified to requirements that exceed the requirements of ANSI N45.2.6-1978.

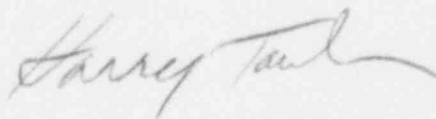
During operations, the Operational QA program will be in compliance with N45.2.6-1978. However, Edison takes exceptions to the Staff positions C.5 and C.6 of Reg. Guide 1.58, Rev. 1.

With respect to Staff position C.5, it is our position that cognizant engineering personnel, who will not necessarily be qualified as Level III, should be permitted to review and approve selected inspection and test procedures.

Our exception to Staff position C.6, regarding the educational requirements, is based on our concern that these requirements when applied to contractors and vendors would disqualify fully qualified inspection personnel who lack the education but have demonstrated the ability to perform. Ability to perform should be the only criterion.

Appendix A of the FSAR will be modified to reflect these positions.

Sincerely,



Attachment

cc: Mr. L. L. Kintner
Mr. B. Little