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June 14, 1990 NRC-90-0088

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

References: 1)

- NRC Docket No. 50-341 NRC License No. NPF-43
- NRC Inspection Report 87009, dated March 12, 1987
- 3) NRC Inspection Report 89008, dated June 1, 1988
- 4) Detroit Edison Letter to NRC, NRC-87-0028, dated April 13, 1987
- Detroit Edison Letter to NRC, NRC-87-0131, dated September 2, 1987

Subject:

Commitment Changes from NRC Violation 87009-03 on Inservice Test Program Notifications

The purpose of this letter is to discuss changes made to a commitment that addresses the calibration frequency for Inservice Test (IST) instrumentation.

Notice of Violation (NOV) 87009-03 documented failures to make proper notification to the IST personnel of out-of-calibration conditions for IST instrumentation when this condition was identified by field personnel. This was controlled by the administrative equirement in Fermi 2 procedure 41.000.11, "Calibration of Process Instrumentation", Step 4.1.2.2. However, the procedure did not specify who was responsible to make the notification. There were instances (1984 through 1986) identified where the notification was not made.

Detroit Edison initiated several corrective actions, one of which was that the calibration frequency for IST instrumentation was increased from once per 18 months to once per 9 months.

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Currently, Fermi 2 procedure NPF-MA1-02, "Preventative Maintenance and Periodic Calibration and Testing", provides guidelines for periodic calibration of test instrumentation based on operating experience. These guidelines are intended to assure instrumentation is periodically calibrated at intervals appropriate for the functional significance of the instrumentation and its demonstrated reliability. Feedback based on Instrument History Card trends and as-found conditions are considered when evaluating the calibration frequency for all instrumentation. If as-found calibration checks are satisfactory or unsatisfactory for several performances, typically 2 or more, the performance interval for the calibration check may be extended or shortened, as appropriate.

Detroit Edison is currently using and will continue to use this philosophy for the IST instrumentation, which is in accordance with NPP-MA1-02. As a result, the 9 month calibration frequency for IST instrumentation is no longer appropriate or in use.

If you have any questions regarding this matter, please contact Mr. Joseph Pendergast, Compliance Engineer, at (313) 586-1682.

Sincerely,

cc: A. B. Davis

R. W. DeFayette

W. G. Rogers

J. F. Stang

Region III