Edward Hines
Assistant Vice President
and Manager-Quality Assurance
(313) 237-8604

Detroit Edison

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

November 1, 1978
EF2-44,332

Mr. James G. Keppler, Director
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Supplemental Information: IE Report No. 50-341/78-09

This letter is in response to the request of your Mr. Phillips that supplemental information be provided to clarify certain responses contained in our letter dated September 14, 1978, regarding items of noncompliance identified in Appendix A of your letter dated August 11, 1978, and IE Inspection Report No. 50-341/78-09.

The responses to be clarified involve items A.1, A.2, G.1 and G.2 of Appendix A as discussed in a telephone conversation between Mr. Phillips and Mr. Alessi of our office on September 28, 1978. The request for the supplemental information was confirmed in your letter of October 12, 1978, received by us on October 18, 1978.

The requested information is provided in the attached enclosure.

We trust that the additional information is sufficient to close the open items.

Very truly yours,

E. M. Hardel

For Edward Hines

TAA:mb
Enclosure

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THE DETROIT EDISON COMPANY

QUALITY ASSURANCE DEPARTMENT

ENRICO FERMI 2 PROJECT

Supplemental Information to Responses in EF2-43,539, September 14, 1978

Docket No. 50-341 License No. CPPR-87

Inspection at: Detroit Edison Offices and Enrico Fermi 2 Site

Inspection Conducted: June 5-9, 1978

Prepared by: T. A. Alessi

Items A.1 and A.2

After the startup of the project, the procedures for keeping management informed on the status of the QA program were changed to the practices described in our response of September 14, 1978. The changes were made to self-imposed requirements.

The referenced review of the QA program by a management consultant as part of the audit of Company operations required by the Public Service Commission was only that, a review, and not an in-depth evaluation. An evaluation of the program by an agency experienced in performing audits of QA programs has been scheduled. Findings will be reported to higher management.

On the matter of audit schedules, it should be noted that throughout the life of the project, audit schedules were established and maintained in the sense that schedules were followed. However, records of the schedules established for prior years are not available because copies of such schedules were not placed in record files but logs of all audits performed were kept and are available for review. It will now be part of the practice to keep copies of audit schedules for record purposes. Such records are not to be regarded as lifetime records and will only be kept to the end of construction.

On the matter of auditing "all aspects" of the QA program, it should be noted that before the shutdown of the project, all areas of activity subject to the requirements of the QA program were audited except for the QA organization. Since the startup of the project, the only area not audited formally, outside of the Edison QA organization, is the Daniel site QA group which is responsible for assuring that the Edison QA program is being adequately implemented by Daniel and other contractors.

A formal audit of this organization is currently in progress. It should be noted that the daily contacts between Edison and Daniel QA, the approval of Daniel QA procedures and planning, the scheduled weekly meetings between respective supervisors, the performance of joint audits, the review of all Daniel audits, etc., have provided Edison QA with ample opportunity to assess the Daniel QA performance and, therefore, no one should misconstrue the situation as being one where Edison was not aware of what was going on.

Item G.1

A procedure has been established to assure that positive findings are documented and that a description or identification of objective evidence examined during an audit is kept in record files and/or included in the audit report. In the majority of cases, this has been done in the past. The current procedure will assure that this is always done. Copies of the audit plan or check list and a record of the findings including an identification of the objective evidence examined will be kept on file.

Item G.2

In the past, the Edison project QA personnel have had line responsibility for the review and concurrence on quality and quality assurance matters

Item G.2 (Cont'd.)

involving the procurement of QA Level 1 (safety-related) components when procurred by the Edison project engineering organization. This involved bid documents, proposal evaluations and issuance of contracts. The General Purchasing Department was not involved in any decision process involving quality-related matters either before or after award of contract with the exception of its Inspection Division which has been involved in the source inspection of hardware in accordance with surveillance plans established with project QA. Inspection personnel have also participated in vendor audits. Thus, adequate control has been exercised over Edison's procurement of safety-related components. Project QA is continuing its direct involvement on procurements originated by Project engineering.

Currently, there are procurement activities originating from the site involving QA Level I materials and replacement parts. These activities involve both Daniel International and Edison's General Purchasing Department and are being performed in accordance with established procedures. These activities are subject to auditing by Edison QA.

TAA:mb