JUL 26 1982

Docket No.: 50-341

MEMORANDUM FOR: Atomic Safety and Licensing Board for Fermi 2

FROM: Robert A. Purple, Deputy Director, Division of Licensing, NRR

SUBJECT: INFORMATION REGARDING QUALITY ASSURANCE DURING CONSTRUCTION AND EMERGENCY PREPAREDNESS (BN 82-77)

In accordance with NRR Office Letter No. 19 Revision 1, the enclosed reports are sent for information. This information may be relevant and material to contentions regarding quality assurance during construction and evacuation of a small community near the plant during emergencies.

By our April 30, 1982 board notification (BN 82-43), we transmitted NRC Inspection Report No. 50-341/82-01 which identified items of non-compliance with the NRC quality assurance criteria. Enclosure 1 provides Detroit Edison's responses for these non-compliance items. The NRC staff's evaluation of these responses will be provided in future inspection reports.

Enclosure 2 provides revised radiological emergency response plans for Fermi 2, the State of Michigan, Monroe County, and Wayne County. Implementing procedures for the Fermi 2 plan which provide detailed action descriptions are listed in Appendix 2 of the Fermi 2 plan. These procedures were transmitted to the NRC but are not included in this board notification because the emergency action descriptions in the Fermi 2 emergency plan are sufficiently detailed. Enclosure 2 also provides a report entitled "Estimate of Evacuation Times" that was transmitted to the NRC with the emergency plans. Enclosure 2 is included only with copies sent to those on the OELD service list because the emergency plans are bulky and they have received the standard NRC distribution. The NRC staff's evaluation of these emergency response plans will be provided in Supplement No. 3 to the Fermi 2 Safety Evaluation Report, scheduled to be issued in September 1982.

The information transmitted in this board notification is unique to the Fermi 2 plant.

Sincerely,

Original signed by
Robert A. Purple

Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As stated

*See previous yellow.

OFFICE	cc w/encl.: See next page	DL:LB#1	DL:LB#1	DL:DDIR	
		LKintner/yt	JYoungblood*	RAPurple	
		7/19/82	7/ /82	7/23/82	

Docket No.: 50-341

MEMORANDUM FOR: Atomic Safety and Licensing Board for Fermi 2

FROM: D. G. Eisenhut, Director, Division of Licensing, NRR

SUBJECT: INFORMATION REGARDING QUALITY ASSURANCE DURING CONSTRUCTION AND EMERGENCY PREPAREDNESS (BN 82-)

In accordance with NRR Office Letter No. 19 Revision 1, the enclosed reports are sent for information. This information may be relevant and material to contentions regarding quality assurance during construction and evacuation of a small community near the plant during emergencies.

By our April 30, 1982 board notification (BN 82-43), we transmitted NRC Inspection Report No. 50-341/82-01 which identified items of non-compliance with the NRC quality assurance criteria. Enclosure 1 provides Detroit Edison's response for these non-compliance items.

Enclosure 2 provides revised radiological emergency response plans for Fermi 2, the State of Michigan, Monroe County, and Wayne County. Implementing procedures for the Fermi 2 plan which provide detailed action descriptions are listed in Appendix 2 of the Fermi 2 plan. These procedures were transmitted to the NRC but are not included in this board notification because the emergency action descriptions in the Fermi 2 emergency plan are sufficiently detailed. Enclosure 2 also provides a report entitled "Estimate of Evacuation Times" that was transmitted to the NRC with the emergency plans. Enclosure 2 is included only with copies sent to those on the OELD service list because the emergency plans are bulky and they have received the standard NRC distribution.

The information transmitted in this board notification is unique to the Fermi 2 plant.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/encl.: See next page

OFFICE	DL:LB#1	DL:LB#1	DL:DIR				
SURNAME	LKintner/yt	JYoungblood	DEisenhut				
DATE	7/13/82	7/14/82	7/ /82				

NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO: 1981—335-960

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Fermi 2/ASLB **
Docket No. 50-341

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Dr. David R. Schink

Mr. David E. Howell
Peter A. Marquardt, Esq.
Harry Voigt, Esq.

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* with Enclosure 1
** with Enclosure 1 and 2

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Enclosure 1

Detroit Edison Company Response
to Items of Non Compliance
described in IE Report 50-341/82-01

JUN 24 1982

Docket No. 50-341

The Detroit Edison Company
ATTN: Mr. Donald A. Wells
Manager, Quality Assurance
2000 Second Avenue
Detroit, MI 48226

Gentlemen:

Thank you for your letter dated April 30, 1982, and your amended response dated June 7, 1982, informing us of the steps you have taken to correct the noncompliances which we brought to your attention in Inspection Report No. 50-341/82-01 forwarded by our letter dated April 1, 1982. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely,

R. L. Spessard, Director
Division of Project and
Resident Programs

cc w/ltrs dtd 4/30/82
and 6/7/82:
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Ronald Callen, Michigan Public
Service Commission
Harry H. Voight, Esq.

IE01

OFFICE	RIII for	RIII	RIII				
SURNAME	Konklin/jk	Streeter	Spessard				
DATE	6/22/82	6/23/82	6/24/82				

Detroit Edison

Donald A. Wells
Manager Quality Assurance
(313) 237-9657

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

April 30, 1982
EF2-57465

Mr. R.L. Spessard, Director
Division of Project and
Resident Programs
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Noncompliance at Enrico Fermi Unit 2 Construction Site

Dear Mr. Spessard:

This letter responds to the items of noncompliance described in your IE Report 50-341/82-01. This inspection of Enrico Fermi Unit 2 Site Construction activities was performed by the Site Resident Inspectors Messrs. B.H. Little and P.M. Byron of NRC Region III during the month of January, 1982.

Only the cited items of noncompliance are discussed in this reply, as required by Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

The enclosed response is arranged in sequence of items cited in the body of your report. The finding and section numbers are referenced. We trust this letter satisfactorily answers the concerns raised in your report. We will be glad to discuss any further concerns you may have.

Very truly yours,

D A Wells

DAW/HAW/cp

cc: Mr. Richard DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Bruce Little, Resident Inspector
U.S. Nuclear Regulatory Commission
6450 North Dixie Highway
Newport, Michigan 48166

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S.H. Noetzel
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J.D. Ryan
L.E. Schuerman
H. Tauber
G.M. Trahey
R.A. Vance/L.E. Eix
H.A. Walker
A.E. Wegele
Document Control
NRC Follow-Up Book/NRC File
Chron File

THE DETROIT EDISON COMPANY

QUALITY ASSURANCE DEPARTMENT

ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/82-01

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection conducted: January, 1982

Prepared by: H. A. Walker
H.A. Walker, Supervisor
Construction QA

Approved By: T. A. Alessi
T.A. Alessi, Director
Project Quality Assurance

Response to NRC Inspection Report # 50-341/82-01

1. Statement of Violation 82-01, Appendix A (82-01-06)

Contrary to 10CFR50, Appendix B, Criterion XVI and the Enrico Fermi Unit 2 Quality Assurance Manual, Section 17.1.3, inadequate corrective actions were taken with regard to the failure of the Core Spray System Expansion Bellows during system hydrotest, in that actual pressure and displacement conditions which contributed to failure of the bellows were not factored into the evaluation of the failure, and were not documented and reported in accordance with the licensee's corrective action system.

Corrective Action Taken and the Results Achieved

The failed Core Spray System Bellows were removed prior to initiation of a nonconformance report (NCR). An NCR was issued and is being processed through the site NCR system.

The Core Spray System Bellows apparently failed due to over-pressurization during a filling operation prior to flushing. Engineering has performed a re-evaluation of components in the core spray system and the flushing pressure was reduced for this system.

Engineering investigation also determined that the expansion bellows were inadequately supported. The specific application and design for the bellows should have specified the use of tie bars necessary to restrain the axial pressure and seismic load, only allowing movement in the lateral and vertical directions. However, the bellows were designed and delivered without tie-rods.

Engineering design presently requires replacing bolt expansion bellows with bellows that include tie-rods.

Corrective Action Taken to Avoid Further Noncompliance

This incident has been discussed thoroughly with the management of the organizations involved and the necessity for immediate documentation of nonconformances has been emphasized. No additional incidents of removal of nonconforming items prior to initiation of NCRs and evaluation of failures have been noted.

A hold was placed on flushing operations and Engineering performed a re-evaluation of components in other systems being flushed at pressures in excess of the required hydrostatic test pressure. As this re-evaluation was completed flushing operations were allowed to resume.

Date When Full Compliance Will Be Achieved

Engineering re-evaluation of system components and investigation of the problem have been completed. Replacement Core Spray System Bellows will be installed prior to fuel load.

2. a. Statement of Violation 82-01, Appendix A (82-01-01)

Contrary to 10CFR50, Appendix B, Criterion V, and the Enrico Fermi 2 Quality Assurance Manual, Section 9.1.5, Reactor Controls (RCI) Procedure AC-1, Revision 2, requirements regarding access cleanliness control were not being implemented in the area of the reactor pressure vessel (RPV), in that a clean room had not been established for entry; material and tools were not being logged in and out of the RPV, and personnel were allowed to enter the RPV without removing or securing loose personal articles.

Corrective Action Taken and the Results Achieved

A clean room has now been established at the entrance to the reactor pressure vessel and the logging of tools and securing of personal items is now being performed. After discovery of the problem personnel controlling access to the reactor pressure vessel were immediately reindoctrinated in procedural requirements. Compliance to the procedure was verified by both Reactor Controls Quality Control and Project Quality Assurance.

Corrective Action Taken to Avoid Further Noncompliances

Personnel controlling access to the reactor vessel were immediately reindoctrinated in the requirements of RCI Procedure AC-1, Revision 2. The procedure (AC-1) was re-reviewed for compliance to General Electric and Project requirements and was updated for clarification.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

2. b. Statement of Violation 82-01, Appendix A (82-01-03)

Contrary to 10CFR50, Appendix B, Criteria V, and the Enrico Fermi 2 Quality Assurance Manual, Section 9.1.5, Detroit Edison's subcontractor failed to provide documented instructions for an activity affecting quality, i.e., the removal of machining chips from the control rod drive housing.

Corrective Action Taken and the Results Achieved

The machining chips in the CRD housing assemblies were removed by locating the chips using a mirror and then removing the chips by using angle needle nose pliers, a wire hook or other suitable means. This was the method specified by a memorandum from General Electric. After removal of the chips the affected surfaces of the CRD housing assemblies were re-inspected using the GE manufacturing drawing for acceptance or rejection of the assemblies. All CRD housing assemblies were inspected in this area. The entire operation is very simple and should not require a detailed documented procedure to perform. Detroit Edison feels that to proceduralize to this level is impractical and beyond the intent of Criterion V of 10CFR50, Appendix B.

Corrective Action Taken to Avoid Further Noncompliance

This matter has been thoroughly discussed with the Contractor quality personnel. They are fully informed of the requirement and need for procedures for work on safety related equipment.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

3. Statement of Violation 82-01 Appendix A (82-01-02)

Contrary to 10CFR50 Appendix B, Criterion XVI and the Enrico Fermi Unit 2 Quality Assurance Manual, Section 17.1.1, Detroit Edison's subcontractor Quality Control personnel failed to promptly identify and report on machining chips found in the control rod drive housings in accordance with the licensee's procedures.

Corrective Action Taken and the Results Achieved

General Electric's NED quality inspector noted, reported and recorded the machining chips in his weekly report in week 17 of 1981. This item was then recorded in GE's Open Items Log. This method of tracking unresolved items is required by the General Electric QA Program. All loose and easily removed chips have been removed and the control rod drive (CRD) housings have been re-inspected. A Deviation Disposition Request (nonconformance report) has been written on nine CRD housing assemblies from which the chips could not be removed or which have a rough machined surface. This DDR is now being processed through the Project DDR system.

The machining chips were not considered a significant problem for the following reasons:

1. The machining chips were not loose and probably would not have been dislodged in normal operations.

2. The machining chips did not interfere with the insertion and locking of the thermal sleeve during the thermal sleeve trial fit.

3. If the problem had not been noted and the chips were to be dislodged, the most likely time would be during flushing operations which would mean they would be removed from the system.

4. With the thermal sleeve installed, it is almost impossible for chips to reach the CRD.

5. Three filters are provided on the CRD to prevent foreign material from entering the drive.

Corrective Action Taken to Avoid Further Noncompliances

Procedural requirements for documenting nonconformances have been discussed with RCI and GE. These contractors have been instructed to take the steps necessary to ensure that the contractor organizations follow Project Procedures for controlling nonconforming material.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

4. Notice of Violation 82-01, Appendix A (82-01-04)

Contrary to 10CFR50, Appendix B, Criterion XV and the Enrico Fermi 2 Quality Assurance Manual, Section 7.0.1 effective measures were not established to prevent the installation of nonconforming control rod drive housings(i.e., they contained machining chips) in the reactor vessel.

Corrective Action Taken and the Results Achieved

The Control Rod Drive Housing assemblies were manufactured by General Electric at their Wilmington, North Carolina facility and received at the site in 1972. After manufacture the parts were cleaned prior to final inspection by immersion in an agitated hot (180°F) alkaline solution followed by a hot deionized water rinse (180°F). The parts were tilted at each operation to accelerate drainage from the narrow opening (cap end) to the bottom end.

The parts were examined 100% visually for cleanliness following these cleaning operations. (It should be noted that the machining chips were not loose and were located underneath the inside lip of the CRD housing assemblies where they were not visible without an inspection mirror.)

In addition to this, at the time of manufacture a Detroit Edison source inspector performed a sampling inspection to assure that GE's inspections were being adequately performed.

Corrective Action Taken to Avoid Further Noncompliance

General Electric was notified of the problem and they have stated that the problem had been previously addressed. GE's letter of February 5, 1982 states, "We have had previous occurences similar to the incident at Fermi. There has not been any similar problems in the past few years and this is attributed to an increased awareness of cleanliness requirements by inspector and shop cleaning personnel. To my knowledge, no complaints have been received since the added discipline was imposed".

Date When Full Complaince Will Be Achieved

The Fermi 2 Project is now in compliance in this area.

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
29th day
of April, 1982

Jennifie Kyko

JENNIFIE KYKO
Notary Public, Monroe County, M\
My Commission Expires Nov. 25, 1984

Detroit Edison

Donald A. Wells
Manager-Quality Assurance
(313) 237-9657

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

June 7, 1982
EF2-58073

Mr. R.L. Spessard, Director
Division of Project and
Resident Programs
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Reference: Letter EF2-57465 Dated April 30, 1982 from Donald A. Wells to R.L. Spessard

Subject: Noncompliance at Enrico Fermi Unit 2 Construction Site

Dear Mr. Spessard:

This letter provides an amended response to the items of noncompliance described in your IE Report 50-341/82-01. This inspection of Enrico Fermi Unit 2 Site Construction activities was performed by the Site Resident Inspectors Messrs. B.H. Little and P.M. Byron of NRC Region III during the month of January, 1982.

Based on discussions with the NRC Site Resident Inspectors and Project Quality Assurance Management, Detroit Edison has decided to revise the action taken on inspection items 2-b and 4. Although the entire report is being re-submitted, no other items or information has been changed. We feel this revised response more accurately describes the actions taken.

The enclosed response is arranged in sequence of items cited in the body of your report. The finding and section numbers are referenced. We trust this letter satisfactorily answers the concerns raised in your report. We will be glad to discuss any further concerns you may have.

Very truly yours,

DAW/HAW/cp

cc: Mr. Richard DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Bruce Little, Resident Inspector
U.S. Nuclear Regulatory Commission
6450 North Dixie Highway
Newport, Michigan 48166

JUN 16 1982

THE DETROIT EDISON COMPANY

QUALITY ASSURANCE DEPARTMENT

ENRICO FERMI 2 PROJECT

Amended Response to NRC Report No. 50-341/82-01

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection conducted: January, 1982

Prepared By: H. A. Walker
H.A. Walker, Supervisor
Construction QA

Approved By: T. A. Alessi
T.A. Alessi, Director
Project Quality Assurance

Response to NRC Inspection Report # 50-341/82-01

1. Statement of Violation 82-01, Appendix A (82-01-06)

Contrary to 10CFR50, Appendix B, Criterion XVI and the Enrico Fermi Unit 2 Quality Assurance Manual, Section 17.1.3, inadequate corrective actions were taken with regard to the failure of the Core Spray System Expansion Bellows during system hydrotest, in that actual pressure and displacement conditions which contibuted to failure of the bellows were not factored into the evaluation of the failure, and were not documented and reported in accordance with the licensee's corrective action system.

Corrective Action Taken and the Results Achieved

The failed Core Spray System Bellows were removed prior to initiation of a nonconformance report (NCR). An NCR was issued and is being processed through the site NCR system.

The Core Spray System Bellows apparently failed due to over-pressurization during a filling operation prior to flushing. Engineering has performed a re-evaluation of components in the core spray system and the flushing pressure was reduced for this system.

Engineering investigation also determined that the expansion bellows were inadequately supported. The specific application and design for the bellows should have specified the use of tie bars necessary to restrain the axial pressure and seismic load, only allowing movement in the lateral and vertical directions. However, the bellows were designed and delivered without tie-rods.

Engineering design presently requires replacing both expansion bellows with bellows that include tie-rods.

Corrective Action Taken to Avoid Further Noncompliance

This incident has been discussed thoroughly with the management of the organizations involved and the necessity for immediate documentation of nonconformances has been emphasized. No additional incidents of removal of nonconforming items prior to initiation of NCRs and evaluation of failures have been noted.

A hold was placed on flushing operations and Engineering performed a re-evaluation of components in other systems being flushed at pressures in excess of the required hydrostatic test pressure. As this re-evaluation was completed flushing operations were allowed to resume.

Date When Full Compliance Will Be Achieved

Engineering re-evaluation of system components and investigation of the problem have been completed. Replacement Core Spray System Bellows will be installed prior to fuel load.

2. a. Statement of Violation 82-01, Appendix A (82-01-01)

Contrary to 10CFR50, Appendix B, Criterion V, and the Enrico Fermi 2 Quality Assurance Manual, Section 9.1.5, Reactor Controls (RCI) Procedure AC-1, Revision 2, requirements regarding access cleanliness control were not being implemented in the area of the reactor pressure vessel (RPV), in that a clean room had not been established for entry; material and tools were not being logged in and out of the RPV, and personnel were allowed to enter the RPV without removing or securing loose personal articles.

Corrective Action Taken and the Results Achieved

A clean room has now been established at the entrance to the reactor pressure vessel and the logging of tools and securing of personal items is now being performed. After discovery of the problem personnel controlling access to the reactor pressure vessel were immediately reindoctrinated in procedural requirements. Compliance to the procedure was verified by both Reactor Controls Quality Control and Project Quality Assurance.

Corrective Action Taken to Avoid Further Noncompliances

Personnel controlling access to the reactor vessel were immediately reindoctrinated in the requirements of RCI Procedure AC-1, Revision 2. The procedure (AC-1) was re-reviewed for compliance to General Electric and Project requirements and was updated for clarification.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

2. b. Statement of Violation 82-01, Appendix A (92-01-03)

Contrary to 10CFR50, Appendix B, Criteria V, and the Enrico Fermi 2 Quality Assurance Manual, Section 9.1.5, Detroit Edison's subcontractor failed to provide documented instructions for an activity affecting quality, i.e., the removal of machining chips from the control rod drive housing.

Corrective Action Taken and the Results Achieved

The machining chips in the CRD housing assemblies were removed where possible by locating the chips by using a mirror and then removing the chips by using angle needle nose pliers, a wire hook or other suitable means. This work has now been completed and is the method specified by the memorandum from General Electric. After removal of the chips all affected surfaces of the CRD housing assemblies were re-inspected using the GE manufacturing drawing for acceptance or rejection of the assemblies. Based on this criteria nine of the assemblies were rejected where complete removal of the chips could not be accomplished. These assemblies are now being processed by the site Deviation Disposition Request (DDR) system. Although the chip removal was not proceduralized in detail, the results are considered acceptable by Detroit Edison with the exception of the nine CRD housing assemblies which were rejected.

Corrective Action Taken to Avoid Further Noncompliance

This matter has been thoroughly discussed with the Contractor quality personnel. They are fully informed of the requirement and need for procedures which adequately describe acceptance criteria for work on safety related equipment.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

3. Statement of Violation 82-01 Appendix A (82-01-02)

Contrary to 10CFR50 Appendix B, Criterion XVI and the Enrico Fermi Unit 2 Quality Assurance Manual, Section 17.1.1, Detroit Edison's subcontractor Quality Control personnel failed to promptly identify and report on machining chips found in the control rod drive housings in accordance with the licensee's procedures.

Corrective Action Taken and the Results Achieved

General Electric's NED quality inspector noted, reported and recorded the machining chips in his weekly report in week 17 of 1981. This item was then recorded in GE's Open Items Log. This method of tracking unresolved items is required by the General Electric QA Program. All loose and easily removed chips have been removed and the control rod drive (CRD) housings have been re-inspected. A Deviation Disposition Request (nonconformance report) has been written on nine CRD housing assemblies from which the chips could not be removed or which have a rough machined surface. This DDR is now being processed through the Project DDR system.

The machining chips were not considered a significant problem for the following reasons:

1. The machining chips were not loose and probably would not have been dislodged in normal operations.

2. The machining chips did not interfere with the insertion and locking of the thermal sleeve during the thermal sleeve trial fit.

3. If the problem had not been noted and the chips were to be dislodged, the most likely time would be during flushing operations which would mean they would be removed from the system.

4. With the thermal sleeve installed, it is almost impossible for chips to reach the CRD.

5. Three filters are provided on the CRD to prevent foreign material from entering the drive.

Corrective Action Taken to Avoid Further Noncompliances

Procedural requirements for documenting nonconformances have been discussed with RCI and GE. These contractors have been instructed to take the steps necessary to ensure that the contractor organizations follow Project Procedures for controlling nonconforming material.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance with requirements in this area.

4. Notice of Violation 82-01, Appendix A (82-01-04)

Contrary to 10CFR50, Appendix B, Criterion XV and the Enrico Fermi 2 Quality Assurance Manual, Section 7.0.1 effective measures were not established to prevent the installation of nonconforming control rod drive housings (i.e., they contained machining chips) in the reactor vessel.

Corrective Action Taken and the Results Achieved

The machining chips have been removed from the control rod drive housing assemblies where possible and the housings have been re-inspected to manufacturing requirements.

Corrective Action Taken to Avoid Further Noncompliance

General Electric was notified of the problem and they have stated that the problem had been previously addressed. GE's letter of February 5, 1982 states, "We have had previous occurrences similar to the incident at Fermi. There has not been any similar problems in the past few years and this is attributed to an increased awareness of cleanliness requirements by inspector and shop cleaning personnel. To my knowledge, no complaints have been received since the added discipline was imposed."

Since the receipt of the CRD housing assemblies additional steps were taken to improve source inspection activities. These are as follows:

a. One Hundred percent source inspection is now required in problem areas instead of allowing Source Inspectors to sample.

b. Source inspection criteria has been clarified in problem areas to provide better inspection.

c. Problem areas are discussed with source inspectors to provide increased awareness in these areas.

This matter has been thoroughly discussed with the site contractor in this area to ensure that he understands the need for verifying that adequate inspections are completed for ensuring conformance to requirements.

Date When Full Compliance Will Be Achieved

The Fermi 2 Project is now in compliance in this area.

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 8th day of June, 1982

Jennifie Kyko

JENNIFIE KYKO
Notary Public, Monroe County, MI
My Commission Expires Nov. 26, 1984

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JUL 26 1982

BN 82-77

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