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November 15, 1982
EF2-61200

Mr. R.L. Spessard, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 69137

Subject: Noncompliance at Enrico Fermi Unit 2 Construction Site -
IE Report 50-341/82-13

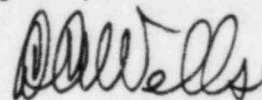
Dear Mr. Spessard:

This letter responds to the item of noncompliance described in your IE Report 50-341/82-13. This inspection of Enrico Fermi Unit 2 Site Construction activities was performed by Mr. F.W. Reimann of NRC Region III on September 13-15, 1982, at the site.

The item of noncompliance is 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 finding and section number is 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/DF/cp

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

Mr. Bruce Little, Senior Resident Inspector
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7450 North Dixie Highway
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THE DETROIT EDISON COMPANY
QUALITY ASSURANCE DEPARTMENT
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/82-13

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection Conducted: September 13-15, 1982

Prepared By: J.R. Icard
J.R. Icard, Startup Assurance
Engineer

Noted By: D. Ferencz
D. Ferencz, Acting Supervisor
Construction Quality Assurance

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

Statement of Violation, 82-13-04, Appendix

Contrary to 10CFR50, Appendix B, Criterion XI and the Enrico Fermi Unit 2 Quality Assurance Manual, which requires written test procedures which include acceptance limits contained in applicable design documents; Preoperational Test Procedure PRET. C4100.001, Revision 3 was approved for use and did not contain acceptance limits for overpressure relief valve setpoints. This procedure also did not contain the current level at which the explosive valve activation logic loss of continuity alarm should operate.

Corrective Action Taken and Results Achieved

The relief valve setpoint specified in Revision 3 of Preoperational Test Procedure C4100.001 was based on General Electric Specification 22A2271AN, Revision 3, which specifies a setpoint of approximately 1400 psig. Further investigation has revealed that this setpoint should be less than or equal to 1400 psig as specified in the Enrico Fermi 2 Technical Specifications, section 3/4.1.5; Detroit Edison Design Specification 3071-507, section 10.21; and the Enrico Fermi 2 FSAR, section 4A.2.3.4.2. A test change notice will be issued against the preoperational test procedure to include the proper setpoint.

The loss of continuity alarm test for the explosive valve circuit contained in Revision 3 of Preoperational Test Procedure C4100.001 is intended to be a functional alarm test, not a setpoint verification. The alarm setpoint was verified by a Checkout and Initial Operation test procedure using Start-up 7.8 form number 2011I. The present preoperational test requirement for the functional alarm test is not worded clearly enough, and could be interpreted as requiring an alarm setpoint verification. A test change notice will be issued against the preoperational test procedure to clarify this test requirement.

Corrective Action Taken to Avoid Further Noncompliance

This action will consist of reviewing Preoperational Test Procedure C4100.001 for other possible errors. In addition, a Startup letter was issued to Startup Test Engineers and Lead Startup Test Engineers bringing the problems noted in the violation to their attention, and requiring special attention be given to acceptance criteria when they review preoperational test procedures prior to submitting them to the Technical Review Committee for release for performance.

Date When Full Compliance Will Be Achieved

Issuance of test change notices to procedure PRET. C4100.001 and review for other possible errors will be accomplished by December 1, 1982. Reviews of other startup test procedures for adequate acceptance criteria will continue as an ongoing process throughout the testing program.