

Detroit
Edison

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NRC-90-0119



U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison Letter to the NRC,
EF2-70388, dated February 19, 1985,
Response to Violation 84-065-01
- 3) Detroit Edison Letter to the NRC,
EF2-70041, dated November 29, 1984,
Response to Violation 84-020-14
- 4) Detroit Edison Letter to the NRC, NRC-89-0092,
Licensee Event Report 89-004,
dated January 17, 1989

Subject: Revision of the Production Quality Assurance Review
Process for Work Requests

Fermi 2 is preparing a revision to its review process for work requests. As a result of this revision, commitments made in References 2, 3 and 4 will be met in a different way than previously described, but the intent of these commitments will still be fulfilled. This letter is being submitted to document this change.

Presently, Production Quality Assurance (PQA) inspectors review the completed work packages prior to the Nuclear Shift Supervisor accepting the work package for operability and closure. This review is qualitative in nature, e.g., verifying appropriate sign-offs have been made and that approved procedures and design documents were used. Based on Detroit Edison's philosophy that each organization has total responsibility for quality, Maintenance will assume this type of review in the future. PQA will implement inspection procedures that require a periodic review of the completed Q and non-Q work packages. By implementing this process, Fermi 2 will be using a performance-based quality control (QC) process, assuring that maintenance is accountable for the quality of work packages. PQA's focus will be on results (work in the plant). Where weaknesses are noted, PQA has been trained to determine the cause(s) and assure adequate corrective actions are implemented.

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Maintenance procedures have been reviewed by PQA and verified to incorporate specific QC hold points which are required by specific commitments and codes. The revision to the work package review process will shift the responsibility to include these QC hold points into work packages from PQA to Maintenance. These QC hold points are included in the maintenance work package as the associated procedures are referenced and used. Maintenance is responsible for referencing the required work procedures in the work packages. Within engineering design packages (EDPs) QC required inspection points are established by engineering. Maintenance will be responsible for incorporating these QC hold points into the work packages as outlined in the EDPs. Periodic surveillances of the work control process will verify that appropriate hold points are being included and the review of work packages is being properly performed.

This revision to the work request review process will indirectly affect commitments made in references 2, 3 and 4. In reference 2, Detroit Edison committed to adding an instruction to the Maintenance Inspection Checklist (MIC) to allow the QC inspectors space to document interpretations, questions or concerns regarding inspection requirements in the work package. This instruction also provided planning guidelines to minimize the need for inspector interpretation in the field. This commitment is still being met with the implementation of the Quality Control Inspection Report (QCIR) which will document the review of work packages. Unsatisfactory attributes and critical comments will be noted on the QCIR. Maintenance will be responsible for ensuring adequate resolution of comments and discrepancies noted on the QCIR. PQA will verify that adequate comment resolution is executed and documented by performing periodic review of closed work request packages.

In Reference 3, Detroit Edison stated that PQA would perform an additional review to determine if adverse trends, which corrective maintenance was not resolving, appeared to exist. If an apparent adverse trend was detected, a Deviation Event Report (DER) would be initiated. Since 1984 when this commitment was made, Fermi 2's corrective action program has undergone a major transition. FMD CAL, "Evaluation and Corrective Actions," and FIP-CAL-01, "Deviation and Corrective Action Reporting," emphasize recurring corrective maintenance as a "condition adverse to quality" (CAQ). When identified by any organization or individual at Fermi, CAQs are addressed by initiating a DER. The Nuclear Plant Reliability Data System (NPRDS), provides accurate data for use in failure statistics and reliability analysis. DERs are initiated when corrective maintenance failure analysis indicates an adverse trend. These programs ensure that adverse trends are identified and resolved. An additional review by PQA is therefore not considered productive. Eliminating PQA from final review of corrective maintenance work packages will not lead to a failure to identify adverse trends which corrective maintenance does not resolve.

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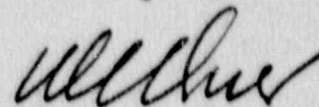
In Reference 4, Detroit Edison committed to have a checklist for documentation of POA review of work packages to ensure discrepancies are adequately addressed. POA will still verify this aspect of work package completion during periodic review of work packages. These periodic reviews will continue to satisfy this commitment. Adverse results identified during these reviews are documented by initiating a DER. Additional reviews of the work package process are included in scheduled audits in accordance with the annual audit schedule.

Detroit Edison anticipates that this work package closure process will decrease system unavailability time and increase the availability of systems, including those important to safety. The emphasis will be upon performance rather than work package review.

Detroit Edison will continue to meet the intent of the commitments referenced above. NOA audits, surveillance and inspection programs will help ensure adequate and effective controls exist in the maintenance process to maintain high quality standards.

These program changes are expected to be in place in early October. Please contact Thomas Bradish Jr. at (313) 586-5076 or Patricia Anthony, Compliance Engineer, at (313) 586-1617, if there are any questions.

Sincerely,



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