

Detroit
Edison

Douglas R. Gipson
Senior Vice President
Nuclear Generation

Fermi 2
5400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5249

April 15, 1994
NRC-94-0021

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

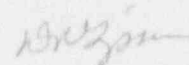
- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) NRC Inspection Report 50-341/93-029
Dated February 7, 1994
 - 3) NRC Inspection Report 50-341/94-004
Dated March 18, 1994

Subject: Reply to a Notice of Violation

Enclosed is Detroit Edison's reply to the Notice of Violation contained within Reference 3, NRC Inspection Report 94-004, for a routine inspection at Fermi. The enclosed reply contains 1) the reason for the violation, 2) the corrective steps that have been taken and the results achieved, 3) the corrective steps that will be taken to avoid further violations, and 4) the date when full compliance will be achieved, as specified by the Notice of Violation.

Should you have any questions concerning this reply contact Kevin J. Morris, Emergency Preparedness Supervisor at (313) 586-4327, or Joseph M. Pendergast, Compliance Engineer at (313) 586-1682.

Sincerely



Enclosure

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer

9404200029 940415
PDR ADOCK 05000341
Q PDR

IEO/
1/1

Statement of Violation:

10 CFR Part 50.54(q) requires, in part, that a licensee follow and maintain, in effect, emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

Section D.2.3. of the Radiological Emergency Response Preparedness (RERP) Plan, which meets the standards and requirements of 10 CFR 50.54(q), contains the required licensee actions following an Alert declaration.

RERP procedure EP-103, "Alert," implements the required emergency response actions contained in Section D.2.3 of the RERP Plan and, as an immediate action, requires an order be issued to assemble all personnel in the Fermi protected area and perform accountability.

Contrary to the above, on December 25, 1993, an order was not immediately issued to assemble all personnel in the Protected Area and perform accountability when the emergency classification was upgraded to an Alert.

The reason for the violation:

The reason for the violation was personnel error on the part of the Nuclear Shift Supervisor (NSS)/Emergency Director. The Emergency Director failed to implement EP-103 in that he did not complete all the actions prescribed by EP-103 Attachment 1, Alert-Checklist for Immediate Actions, immediately upon declaration of an Alert.

The control room crew had verified that all personnel assigned to the work groups known to be onsite were accounted for before the Alert declaration.

The corrective steps that have been taken and the results achieved:

A comprehensive critique of the December 25, 1993 Alert was performed by the Radiological Emergency Response Preparedness (RERP) group. Lessons learned from the Alert were discussed with licensed operators during Licensed Operator Requalification cycle 94-01, Emergency Plan Case Study #27. The lessons learned contained two elements applicable to this violation:

- a. Assembly and accountability must be performed immediately upon declaration of an alert or higher emergency.
- b. The NSS has the option of ordering assembly and accountability at any time, even prior to emergency declaration, if he deems it necessary to ensure the safety of plant employees.

During the January 29, 1994 Unusual Event declaration for an elevator fire the Emergency Director completed EP-102 Attachment 1, Unusual Event - Checklist for Immediate Actions, in a timely manner.

The corrective steps that will be taken to avoid further violations:

Personnel will reinforce in the appropriate emergency preparedness training courses the proper action for implementing a procedure that contains a checklist, as with EP-102 "Unusual Event", EP-103 "Alert", EP-104 "Site Area Emergency", and EP-105 "General Emergency".

Emergency plan implementation will continue to be emphasized during Licensed Operator Requalification simulator sessions as was initiated in late 1993 in response to the emergency preparedness weakness identified in July 1993.

A training course will be developed that delineates the responsibilities the NSS assumes when an emergency is declared. It will cover specifically, that as the Emergency Director he must maintain a broad perspective of the event that will enable him to protect the health and safety of plant employees and the public until properly relieved by the Plant Manager or delegate. The course will be presented to NSSs, Nuclear Assistant Shift Supervisors, and Emergency Directors in an interactive training environment.

Date when full compliance will be achieved:

Full compliance has been achieved based on lessons learned training performed in Licensed Operator Requalification which was completed in February 1994. Full compliance was further demonstrated, as evidenced by completion of the immediate actions in a timely manner during the January 29, 1994 Unusual Event. The additional actions to improve performance and prevent further violations will be completed by August 26, 1994.