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September 24, 1982
EF2-59398

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 50-341/82-08. This inspection of Enrico Fermi Unit 2 Site Construction activities was performed by Mr. I.T. Yin of NRC Region III on May 25-28, June 30, July 1-2, 1982 at the site, and July 1, 1982 at the DECo Corporate office.

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,

DAW/WRW/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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THE DETROIT EDISON COMPANY

QUALITY ASSURANCE DEPARTMENT

ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/82-08

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection Conducted: May 25-28, June 30 and July 1-2, 1982, at the site and July 1, 1982, at the DECo Corporate office.

Prepared By: W.R. Wingfield

W.R. Wingfield, Lead Mechanical Engineer
Construction Quality Assurance

Noted By: D. Ferencz

D. Ferencz, Acting Supervisor
Construction Quality Assurance

Approved By: T.A. Alessi

T.A. Alessi, Director
Project Quality Assurance

Response to NRC Inspection # 50-341/82-08

1. Statement of Violation 82-08, Appendix A (82-08-01)

Contrary to the requirements of 10CFR50, Appendix B, Criterion III and the Enrico Fermi 2 FSAR, Section A 17.1.3, the licensee's control over the A-E's suspension system design, including the proper selection of required snubbers, was inadequate in that rigid restraints were installed in close proximity with mechanical snubbers. The snubbers were made inoperable by restricting the minimum snubber travel required to initiate unit lock-up. Restricting the snubber's travel could increase the design loads at the affected rigid restraints.

Corrective Action Taken and the Results Achieved

A stop work order was issued on May 25, 1982, for all snubber related construction activities. Based upon discussions and agreements between Mr. I.T. Yin (NRC Region III) and members of Edison's Engineering staff, the stop work order would not be lifted until a formal "Snubber Reduction Program" was issued for Fermi 2 by Edison and that program was reviewed and accepted by Mr. Yin. On June 4, 1982, Detroit Edison submitted a proposed "Snubber Reduction Program" to Mr. James G. Keppler (NRC Region III). Based upon a June 7, 1982, telephone conversation between Mr. I.T. Yin and our Mr. J.H. Casiglia, Edison was informed that Mr. Yin had reviewed the proposed program and found it acceptable. On June 8, 1982, Detroit Edison submitted a final record copy of the "Snubber Reduction Program" to Mr. James G. Keppler.

With the acceptance of the "Snubber Reduction Program", Edison proceeded with lifting the stop work order and resumed snubber construction in an orderly and controlled fashion. To date, the major activities relative to the implementation of this program consist of the following:

- In accordance with the "Snubber Reduction Program", on June 9, 1982, the stop work order was lifted for the majority of the snubbers on the 2 inch and smaller ASME Class 2 and 3 lines that were analyzed by generic methods.

- On July 12, 1982, the stop work order was lifted for approximately 160 snubbers on large bore piping systems which must be installed as per the criteria of the "Snubber Reduction Programs."

- In order to compliment construction activities, snubbers located near the RHR Pumps and the Core Spray Pumps were evaluated in accordance with the "Snubber Reduction Program." As a result of that evaluation 28 snubbers are scheduled to be replaced with rigid struts and 4 snubbers will be cancelled.

- Implementation of the "Snubber Reduction Program" is continuing at Edison. The necessary activities are being coordinated with construction activities and Edison's Piping Stress Reconciliation Programs. In accordance with Mr. Isa T. Yin's request, Edison will provide comparison of the number of all suspension components originally required and actually required after the snubber reduction program is completed. This data will be included in the documentation that will be forwarded to the NRC when the program is completed.

Corrective Action Taken to Avoid Further Noncompliances

None. Project Design is confident that the "Snubber Reduction Program" currently being carried out will identify any snubbers that are unnecessary from a thermal expansion viewpoint and will also resolve the issue of dynamic actuation of snubbers.

Date When Full Compliance will be Achieved

Project Design estimates that full compliance with the "Snubber Reduction Program" will be achieved prior to fuel load.

2. Statement of Violation 82-08, Appendix A (82-08-02)

Contrary to 10CFR50, Appendix B, Criterion VI, and the Enrico Fermi 2 FSAR, Section A17.1.6, the Wismer and Becker control of the Interim Change Procedures (ICPs) was not considered to be adequate. The inspector found that all required ICPs were not inserted into the work procedures at the work locations.

Corrective Action Taken and the Results Achieved

The Wismer and Becker Document Control Clerk verified on May 25, 1982, that records indicate the ICPs in question had been sent to the field. The responsible parties were contacted and advised that certain ICPs had been noted as missing from their procedure books. Required copies to correct the noted discrepancies were obtained and added to the procedure books. The complete audit of procedures issued to Construction forces was complete on June 4, 1982.

Site Document Control has performed an audit of their files and they are now up-to-date.

Corrective Action to Avoid Further Noncompliance

A. The Project Engineer has instructed the Document Control Clerk that all procedural changes to procedure books assigned to craft supervision are to be placed in the books by the Document Control Clerk, who will also remove and destroy superceded copies. This is in lieu of permitting the supervisors to update the books themselves.

B. The Project Engineer has issued a memorandum to Craft Supervision advising of the importance of maintaining current procedure books and instructing them that procedures are not to be removed from the books.

Date When Full Compliance Will Be Achieved

The above corrective action is implemented and ongoing. For purposes of documenting full compliance, the date of this response is considered appropriate.