

Detroit
Edison

Douglas R. Gipson
Senior Vice President
Nuclear Generation

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48106
(313) 586-5249

May 13, 1994
NRC-94-0038

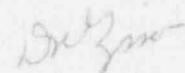
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Inspection Report 50-341/94005,
dated April 13, 1994

Subject: Response to Notice of Violation 94005-04

Enclosed is the response to the Notice of Violation contained in Reference 2. If there are any questions relating to this response, please contact Beth Hare, Senior Compliance Engineer, at (313) 586-1427.

Sincerely,



Enclosure

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

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I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.



DOUGLAS R. GIPSON
Senior Vice President

On this 13th day of May, 1994, before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.



Notary Public

ROSALIE A. ARMETTA
NOTARY PUBLIC STATE OF MICHIGAN
MONROE COUNTY
MY COMMISSION EXP. NOV. 20, 1995

Reply to Notice of Violation 50-341/94005-04

Statement of Notice of Violation 94005-04

"10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Fermi Nuclear Production Procedure, NPP-OP1-12, Paragraph 5.2.5 states, with the exception of specifically defined situations, that 'no personnel other than Operations personnel shall operate plant systems and equipment.'

Contrary to the above, on December 3, 1993, maintenance personnel assigned a work package to replace a leaking instrument valve operated an instrument rack drain valve which resulted in a plant transient involving a steam flow/feed flow mismatch and drop in reactor level."

Reason for the Violation

Root causes of the violation were attributed to inattention to detail, lack of self checking and failure to follow procedure. This conclusion was reached as a result of an evaluation performed with respect to Deviation Event Report (DER) 93-0678. This DER was written to evaluate the cause of the loss of steam flow signal for steam line "C".

The Plant Manager requested a Lessons Learned meeting be included as part of the formal investigation into this event. In part, it was determined that the maintenance workers had difficulty finding the valve and in fact identified an incorrect valve for replacement. The workers also deviated from the Work Request by trying to provide a purge path for welding during the installation of the new valve. The Nuclear Maintenance Journeyman (NMJ) believed that he had the authority to operate valves within a protective tagging boundary. This belief led to his opening a valve to establish vent/purge path for the misidentified valve. The action of valve manipulation by an organization other than Operations is not allowed by NPP-OP1-12, "Tagging and Protective Barrier System". Exceptions are personnel who may operate equipment within a protection boundary or for surveillances with the specific concurrence of Control Room Nuclear Supervising Operator. The action by the NMJ did not meet this exception.

Corrective Actions Taken and the Results Achieved

On December 6, 1993, the Superintendent of Maintenance held two informal meetings with all maintenance personnel to discuss this event and to reinforce his expectations on the proper conduct of maintenance activities.

A Lessons Learned meeting was held with all involved organizations present to discuss this event. The two NMJs received formal discipline under the positive discipline format. Procedure NPP-OP1-12 was reviewed for adequacy. It was concluded that the current procedure, if followed, would have precluded this incident.

To prevent recurrence, the content of this DER was presented to mechanical maintenance in continuing training. The training placed emphasis on "STAR" self checking techniques, and what actions must be taken when equipment is not labeled or any confusion exists over component location. The training specifically discussed NPP-OP1-12 as it relates to the operation of valves/equipment that are contained inside the protection boundary. It also stated who could operate (manipulate) valves/equipment contained inside the protection boundary and under what conditions.

Corrective Actions To Be Taken To Prevent Recurrence

The mechanical maintenance group was involved in this event and received training on this event. To ensure uniform compliance with NPP-OP1-12, DER 93-0678 has been included as required reading for Electrical and I&C Maintenance.

Date When Full Compliance Will Be Achieved

Detroit Edison is currently in compliance with 10 CFR 50, Appendix B, Criterion V.