

**Detroit  
Edison**

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November 7, 1982  
EF2-60506

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 -  
IE Report 50-341/82-12

Dear Mr. Spessard:

This letter responds to the item of noncompliance described in your IE Report 50-341/82-12. This assessment of Enrico Fermi Unit 2 Site Construction activities was performed by Mr. B.H. Little, Senior Resident Inspector of NRC Region III on July 1 - August 31, 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  
U.S. Nuclear Regulatory Commission  
6450 North Dixie Highway  
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THE DETROIT EDISON COMPANY  
QUALITY ASSURANCE DEPARTMENT  
ENRICO FERMI 2 PROJECT

Response to NRC Report No. 50-341/82-12

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

Inspection at: Fermi 2 Site, Monroe, Michigan

Inspection Conducted: July 1 - August 31, 1982

Prepared By: G. J. Kemmer  
G. Kemmer, Lead Systems 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

Statement of Violation, 82-12-02, Appendix, Item 2b

Contrary to 10CFR50, Appendix B, Criterion XVII and the Detroit Edison Fermi 2 Quality Assurance Manual, Project Quality Assurance failed to conduct re-audits to verify implementation of the corrective action committed to in the response to an item of noncompliance identified in NRC Inspection Report No. 50-341/81-09, dated August 15, 1981.

Corrective Action Taken and Results Achieved

NRC Inspection Report 81-09 identified inadequacies in the QA Records storage procedures of Detroit Edison and one of the safety-related site contractors. When these procedures were revised to include the necessary requirements, QA surveillances were conducted to verify implementation. These surveillances, conducted on August 13, 1981, included all safety-related contractors at the site. Although this may not technically meet the QA Manual requirement for re-audit, the same actions were taken to verify proper implementation via the surveillances as would have been done in an audit.

A commitment was made by Project Quality Assurance to "continue to include these requirements as audit check list items to verify implementation". This commitment was not effectively communicated to QA personnel responsible for developing the check lists. On August 11, 1982, a memo was issued by the Acting Supervisor of Construction QA to remind audit personnel of the need to verify required elements of QA Record storage and protection on audits which include Criterion XVII. All such audits since the memo date have included these requirements.

Corrective Action to be Taken to Avoid Further Noncompliance

The Construction QA audit scheduling procedure will be revised to more clearly require that all applicable parts of each Criterion will be audited once every 12 months.

Date When Full Compliance Will be Achieved

The audit scheduling procedure will be revised and issued by November 30, 1982.