

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-341/82-18(DPRP)

Docket No. 50-341

License No. CPPR-87

Licensee: Detroit Edison Company  
2000 Second Avenue  
Detroit, MI 48226

Facility Name: Enrico Fermi Nuclear Power Station, Unit 2

Inspection At: Fermi Site, Monroe, MI

Inspection Conducted: September 1 through October 31, 1982

Inspectors: *J. E. Konklin*  
B. H. Little

11/22/82

*J. E. Konklin*  
P. M. Byron

11/22/82

Approved By: *J. E. Konklin*  
J. E. Konklin, Chief  
Projects Section 2

11/22/82

Inspection Summary

Inspection on September 1 through October 31, 1982 (Report No. 50-341/82-18(DPRP))

Areas Inspected: Licensee Action on Previous Inspection Findings; Electrical Conduit Installation and Inspection Activities; NRC/Licensee Management Meeting; Operating License Issuance; Site Visits; Fire Protection/Prevention; and Plant Tours. The inspection involved a total of 154 inspector-hours onsite by two NRC Inspectors including 28 inspector-hours onsite during off shifts.

Results: No items of noncompliance or deviations were identified.

## DETAILS

### 1. Persons Contacted

T. Alessi, Director, Project QA  
\*F. Agosti, Assistant Manager, Startup Testing  
H. Arora, Startup Engineer  
\*W. Everett, Assistant Project Superintendent, Construction  
\*W. Fahrner, Manager, Fermi-2 Project  
D. Ferencz, Supervisor, Construction QA  
\*E. Griffing, Plant Superintendent  
A. Godoshian, Systems Completion Director  
R. Lenard, Assistant Plant Superintendent  
G. Newton, QA Supervisor, Operational Assurance  
S. Noetzel, Site Manager  
\*G. Trahey, Assistant Director, Project QA

\*Denotes those attending monthly management meeting.

### 2. Licensee Action on Previous Inspection Findings

The inspectors reviewed documents, manuals, reports, and procedures and held discussions with various contractor and licensee personnel and verified that the required actions had been completed.

(Closed) Open Item (341/76-05-02): Organization Structure of Comstock QA. Comstock's QA Manual, Section 4.1.4, Revision A, lists minimum qualification requirements for engineers, specialists, and inspectors performing safety related work.

(Closed) Open Item (341/76-05-03): Comstock QA Installation and Inspection Procedures. Comstock's QA Manual Section 4.1.5, Revision A, identifies engineering and field (craft) personnel as requiring indoctrination and training.

(Closed) Open Item (341/76-05-04): Verification of maintenance of QC proficiency. Comstock's QA Manual, Section 4.1.4, Revision G, identifies methods and the frequency of verifying the maintenance of Q.C. inspector proficiency.

(Closed) Open Item (341/76-05-05): Tentative training schedule not developed. The inspector reviewed LKC records which listed required training and completion times.

(Closed) Open Item (341-76-05-06): Improper location of stop work authority, LKC QA Manual. Section 4.11.1, of the QA Manual, in Paragraphs 3.5.1, 3.5.2 and 3.5.3, delineates stop work authority in the section relative to inspection findings.

(Closed) Open Item (341/76-05-07): Distribution of procedures does not include installation personnel. LKC document control distribution lists were reviewed for several procedures and all contained names of engineering, inspection, installation, and management personnel.

(Closed) Open Item (341/77-05-10): Storage of Utley-James QA File Records. Utley-James is no longer on site. The licensee has provided fire-retardant file cabinets for all contractors on site.

(Closed) Open Item (341/77-05-13): Daniels QC Inspection Assignments. Daniels has had no QC function since February 1980, when the licensee assumed all QA functions under the PQA organization and each site contractor was responsible for his own QC function.

(Closed) Unresolved Item (341/77-10-05): Installation inspection records (switch gear). LKC QA Manual, Section 4.8.3, Form No. 38, addresses the installation inspection record requirements of LKC-WI-000-03-020, Section 4.1. The inspector reviewed installed equipment records for various types of electrical equipment and all met the requirements of the work instruction.

(Closed) Open Item (341/82-01-05): Fire prevention and protection programs. The inspector reviewed Daniel International Construction (DIC) records and procedures and concludes that the procedural weaknesses have been corrected. Through discussions with various contractor and licensee personnel, the inspector verified that site safety was the responsibility of DIC while Nuclear Operations was responsible for fire brigade coordination with support from DIC and contractor organizations.

(Closed) Item of Noncompliance (341/80-20-01): Deficient instrument cable-pulling activities. This item identified deficient cable-pulling activities which were permitted to continue following a cable failure (broken cable). The inspector reviewed licensee corrective action which included; training of personnel, revision of LK Comstock Work Instruction 000-03-008 and DECo Specification 3071-33. In addition, five cables were removed and subjected to visual and dielectric integrity evaluation. This matter is documented in DECo Engineering Research Department Report 82C83-4 which concluded that the integrity of the affected cables had not been impaired.

(Closed) Unresolved Item (341/80-20-02): Acceptability of various cable-pulling links. This item was documented and dispositioned on LK Comstock Field Surveillance Correction Report No. 1656 (FSCR). Licensee evaluation of this matter found that the FSAR incorrectly identified Greenlee as the only approved supplier. LK Comstock revised Work Instruction 000-03-008, which changed the use of a general code number, to identify cable-pulling links with a specific code number and approved manufacturer.

(Closed) Item of Noncompliance (341/80-20-03): Failure to audit in-plant construction activities of the electrical contractor. The licensee conducted audits of the site electrical contractor. These audits are documented in Audit Reports 80-08 and 80-12. The licensee corrective action is considered adequate in this matter.

The licensee advised the inspector of certain TMI and Confirmatory Items which were ready for NRC inspection. The inspector found that the licensee procedures relating to this matter were adequate but had not been implemented. These items are as follows:

(Open) Open Item (341/81-10-12): TMI Item I.C.2, Shift Relief and Turnover Procedures. The inspector completed a review of licensee administrative Procedure 21.000.01, Shift Operations and Control Room, Revision 5. This procedure provides step-by-step instructions at shift relief and turnover for both on-coming and off-going shift supervisors.

The inspector found that the procedure had received licensee review and approval, contained adequate detail, but had not been implemented. In addition, a system to evaluate the effectiveness of the shift relief and turnover procedures has not been established (Reference Safety Evaluation Report Section 22 I.C.2.(3)). This matter remains open pending the above evaluation system and the implementation of Procedure 21.000.01.

(Open) Open Item (341/81-10-13): TMI Item I.C.3, Shift Supervisor Responsibilities. The licensee administrative Procedure 21.000.01 clearly establishes the shift supervisor's command relationship. It also defines the duties, responsibilities, and authority of the shift supervisors and control room operators. When implemented, the procedure will satisfy the requirements of TMI Item I.C.3 of NUREG-0737.

(Open) Open Item (341/81-10-14): TMI Item I.C.4, Control Room Access. The licensee has developed (reviewed and approved) administrative procedure 21.000.01, which establishes the lines of authority and responsibility for limiting control room access. This procedure also establishes clear line of authority and responsibility in the control room during emergencies. This item remains open pending licensee implementation of this procedure.

(Open) Open Item (341/81-10-19): TMI Item II.K.1, Procedures for Assurance of Operability Safety. The inspector completed review of licensee administrative Procedures 12.000.15, Maintenance, and 21.000.02, Operating Logs and Records. When implemented these procedures will satisfy the requirements of Item II.K.1 (10) of NUREG-0737

### 3. Electrical Conduit Installation and Inspection Activities

The Senior Resident Inspector, with a Region III specialist, performed an inspection of conduit installation and related activities of LK Comstock (electrical site contractor). The inspection consisted of an in-plant inspection of conduit installations and related Quality Control inspection documents, review of training and indoctrination of QC inspection personnel, review of installation and inspection procedures, and personnel interviews.

Items of noncompliance were identified during the above inspection. Inspection findings are documented in NRC Inspection Report (341/82-14(DETP)).

4. NRC/Licensee Management Meeting

On October 27, 1982, the inspectors attended an NRC/Licensee Management Meeting at the Region III office. The meeting was held at the licensee's request to promote better understanding of Region III activities and concerns relating to the Fermi-2 project. Subjects discussed at the meeting included the NRC inspection schedule, licensee construction and testing activities, licensee design control review, the construction assessment team report, and licensee organizational changes.

5. Operating License Issuance

On October 29, 1982, the Atomic Safety and Licensing Board issued an initial decision on the application for an operating license for the Enrico Fermi Atomic Power Plant, Unit 2. The initial decision was in favor of the applicant and denied a late petition to intervene by the County of Monroe, Michigan. The decision authorized the Director of NRR, in accordance with 10 CFR 50.57, to issue an operating licence for Fermi-2.

6. Site Visits

On September 28, 1982, the inspector accompanied the Region III Deputy Regional Administrator and staff of the Office of Public Affairs during an onsite tour of the facility. The purpose of the visit was to review the overall construction status and facility familiarization.

On October 14, 1982, the inspector accompanied NRC staff of the Office of Policy Evaluation and General Council, licensee representatives and a representative of Citizens for Employment and Energy during an onsite tour. The purpose of the visit was to familiarize staff members with the facility and surrounding communities.

On October 14-15, 1982, the inspectors accompanied Region III Chief, Projects Branch 1, during onsite inspection of the facility and informal discussion with the licensee. The purpose of the visit was to review licensee construction and testing status and inspection activities.

No items of noncompliance were identified.

7. Fire Protection/Prevention

The inspectors made several tours of the reactor building to verify that fire extinguishers and hoses were in place. The inspectors observed that all hoses were connected and on reels and fire extinguishers were mounted, charged, and in sufficient quantity with one exception. The inspector observed twenty to thirty 55-gallon drums of oil on the fourth floor of the reactor building adjacent to the recirculation pump MG sets, with only two ten-pound CO fire extinguishers protecting the area. The Daniel Site Safety Manager was notified and agreed to take prompt corrective action.

The inspector made a subsequent tour of the affected area to verify that corrective action had been taken. The inspector noted that there was still an insufficient number of fire extinguishers. A later tour of the area was made with the Daniel Site Safety Manager who pointed out various devices and systems available to fight a potential oil fire, including hoses, fire extinguishers and a sprinkler system. However, further discussions with Nuclear Operations and the System Completion Organization (SCO) revealed that the system was not operational and the personnel required to use it were not sure of its status. As a result of the discussions, the system is now functional and may be operated manually.

The inspector also observed the bullet/fire-resistant door to the control room which was manufactured by Chicago Bulletproof.

No items of noncompliance were identified.

8. Plant Tour

The inspectors conducted tours of the RHR Complex, the Reactor, Auxiliary and Turbine Buildings and the Rad Waste area. These areas were inspected for general housekeeping/fire prevention practices, work controls, and maintenance of safety-related system integrity. There has been an overall improvement in general housekeeping conditions within the plant. The licensee has been responsive to a noncompliance cited by the Region III Construction Assessment Team in this area. Licensee corrective action includes issuance of a site administrative procedure, AF-V-16, "Project Housekeeping", weekly housekeeping meetings, and increased surveillance effort.

No items of noncompliance were identified.

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection and summarized the scope and findings of the inspection.