

Detroit
Edison

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NRC-91-0005

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

- Reference:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) NRC Inspection Report 86-011
dated June 13, 1986
 - 3) Detroit Edison Letter VP-860087
dated July 11, 1986
 - 4) NRC Inspection Report 88-031
dated January 24, 1989
 - 5) Detroit Edison Letter NRC-90-0052
dated April 23, 1990

Subject: Commitment Revision in Regards to Violation 86-011-05

The purpose of this letter is to inform the NRC that Detroit Edison is revising a commitment made in regards to NRC Violation 86-011-05. It is our intent to implement this revision immediately following the submittal of this letter based upon the phone conversation between Mr. T. Riley of Detroit Edison and Mr. M. Phillips of NRC Region III on January 23, 1991. If this is not acceptable, please contact Mr. Riley as soon as possible.

Violation 86-011-05 in Reference 2 documented failure to take timely corrective action on 25 audit findings that had been open 6 to 18 months. The response to that identified violation was provided in Reference 3. Two of the committed corrective actions are addressed here. The first action was to issue monthly status reports of all open corrective action documents issued by Nuclear Quality Assurance (NQA). This report highlighted findings open more than 6 months. The second action was to require audited organizations to obtain Director NQA concurrence for audit findings that require resolution in excess of 6 months.

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These items were closed in NRC Inspection Report 88-031 after a review of Detroit Edison's corrective actions. This report stated that a "Delinquent Findings Report", containing QA findings not resolved within 90 days, is issued weekly to management.

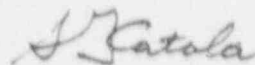
These items were revised in Reference 5 to extend the 90 days to 6 months and to change the required approval from the Director NQA to the Director Plant Safety and the responsible Director/Superintendent. Our continued success at maintaining control of the findings in excess of 6 months has led us to the conclusion that the Delinquent Findings Report is no longer necessary. Our performance history for 1990 and 1991 shows that we have averaged less than one delinquent finding per month using data for the end of each month. In addition the Delinquent Finding Report takes an average of 1 to 1-1/2 mandays per week to produce. These audit resources could be better utilized for performance based audits.

NQA will continue to track delinquent findings via the Deviation Event Report (DER) process (since DERs are used to document and resolve QA findings). This is more meaningful since it is consistent with our corrective action program. Plant Safety currently reports to the plant manager the DER program status on a weekly basis. One of the items included in these reports is the status of delinquent QA findings. In addition, Plant Safety issues a quarterly trend report which also identifies any adverse trends such as an increasing average age or number of delinquent QA findings (findings older than 6 months).

We will continue to follow good auditing practices and have our Audit Team Leaders follow-up on audit findings until they are closed as well as follow-up on the previous audit findings related to current audits. Both of these processes will ensure that no finding resolution "falls into the crack". Since followup of audit finding is being conducted and delinquent findings will still be tracked, elimination of the Delinquent QA Findings Report will have no adverse impact on the timely resolution of QA findings.

If there are any questions concerning this matter, please contact Mr. T. Riley, Supervisor Compliance and Special Projects, at 313-586-1684.

Sincerely,



cc: A. B. Davis
R. W. DeFayette
W. G. Rogers
J. F. Stang
Region III