

Appendix

NOTICE OF VIOLATION

The Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on July 1 - August 31, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation were identified.

1. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Detroit Edison Fermi 2 Quality Assurance Manual, Section 9.0.1 states, "Activities affecting quality shall be prescribed by appropriate written instructions, procedures, or drawings, and accomplished in accordance with these documents."

Contrary to the above:

- a. On July 29, 1982, the inspector found Reactor Controls Incorporated (RCI), a site contractor, performing quality related activities not in accordance with the following RCI procedures:
 - (1) Procedure WP-127 A Section 7.6--Noting of discrepancies on Weld Material Requisition (WMR) Forms.
 - (2) Procedure RCI QA Manual Section 6.5--Processing of WMRs, provides requirement for filing WMRs in the Process Control Sheet File at the end of each shift.
 - (3) Procedure RCI QA Manual Section 9.3--Requirement for storage of QA records in locked fire retardant cabinets.
- b. On August 12, 1982, the inspector found that RCI QA Manual Section 7.3.6 failed to prescribe an appropriate method for documenting the completion of activities affecting quality. The method in use resulted in inadequate QA records and adversely affected measures to assure procedures were used at the job site and that activities were accomplished in accordance with procedures.

This is a Severity Level IV violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion XVIII, states in part, "A comprehensive system of planned and periodic audits shall be carried out... the audits shall be performed in accordance with the written procedures or check lists... follow-up action, including re-audit of deficient areas, shall be taken where indicated."

The Detroit Edison Fermi 2 Quality Assurance Manual, Section 19.3.7, states in part, "Audits shall be conducted... when considered necessary to verify implementation of required corrective actions."

In response to the item of noncompliance identified in NRC Inspection Report (341-81-09) Detroit Edison letter, EF2-54,140, dated August 15, 1981, stated in part, "Project Quality Assurance and all safety-related site contractors are in the process of reviewing and revising their QA Manuals and/or procedures to adequately describe QA record storage and protection requirements. Construction Quality Assurance will continue to include these requirements as audit check list items to verify implementation."

Contrary to the above, on August 6, 1982, the inspector found that:

- a. Project Quality Assurance had not performed an audit of a safety-related site contractor (Reactor Controls, Inc.) to verify implementation of QA record storage and protection requirements.
- b. In May, 1982, Project Quality Assurance performed a QA records audit of a safety-related site contractor (Wisner/Becker); however, the audit check list items did not include "verify implementation" of QA record storage and protection requirements.

This is a Severity Level IV Violation (Supplement II).

With respect to item 1, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter. With respect to item 2, pursuant to the provisions of 10 CFR 2.201 you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

R. L. Spessard, Director
Division of Project and
Resident Programs