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NRC-94-0099

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

- Reference:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Detroit Edison Letter to NRC, "Submittal of Revision 6 to the Fermi 2 Updated Final Safety Analysis Report and the Annual 10 CFR 50.59 Safety Evaluation Summary Report," NRC-93-0033, dated May 7, 1993
 - 3) NRC Letter to Detroit Edison, Ring to Gipson, dated August 5, 1994
 - 4) NRC Letter to Detroit Edison, Miller to Orser, dated September 30, 1991
 - 5) Detroit Edison Letter to NRC, NRC-91-0088, dated August 28, 1991

Subject: Summary of Changes to Quality Assurance Program, Updated Final Safety Analysis Report (UFSAR), Section 17.2, Revision 6, April 1993

Enclosed please find a summary description of the changes to the Quality Assurance Program as a result of Revision 6 to the UFSAR. This summary is being submitted to fulfill the requirements of 10 CFR 50.54(a)(3)(ii). The enclosure provides the basis for concluding that the revised program continues to satisfy the criteria of Appendix B and the QA Program commitments previously accepted by the NRC. Also included in the summary is Detroit Edison's evaluation of the three items discussed in Reference 3 as a part of Items 5, 6, 7, and 10 and why these items are not considered a reduction in the program.

Detroit Edison has taken corrective actions to ensure that in the future a summary of the changes to the Quality Assurance Program will be submitted along with the revision to the UFSAR in accordance with 10 CFR 50.54(a)(3)(ii).

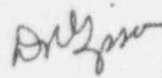
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Should you have any questions please call Ms. Lynne S. Goodman at
(313) 586-4097.

Sincerely,



Enclosure

cc: B. L. Burgess
T. G. Colburn
J. B. Martin
M. P. Phillips
T. Vogel

DESCRIPTION OF CHANGES TO THE QUALITY ASSURANCE PROGRAM
INCORPORATED IN REVISION 6
OF THE FERMI 2 UFSAR, SECTION 17.2

1. Organization Changes - The majority of changes to Section 17.2 were due to a major reorganization that was implemented in a step-wise fashion and resulted in organization and title changes. The purpose of the reorganization was to improve communications and performance and to better align the organization for the future. Each change was evaluated. The basis for concluding that the revised program continues to satisfy the criteria of Appendix B and does not reduce Quality Assurance (QA) Program commitments can be summarized as 1) no QA functions were dropped and 2) the QA Department continued to report to the same or higher level of management.
2. Numbering and minor editorial changes were made for consistency with UFSAR format, clarification, and to correct typographical errors.
3. Section 17.2.1.5 was revised to delete the provisions that the NQA organization arranges for providing quality functions from contractors to support other Nuclear Generation units. The basis of the change was that sufficient expertise existed within the NQA organization to perform quality assurance functions for other Nuclear Generation units and should contractor expertise be required, it would be obtained in accordance with Section 17.2.2.5 which addresses contractor QA programs.
4. Section 17.2.1.5.1 and 17.2.1.5.2 were revised to clarify which QA Department Section was responsible for which activities. The basis for the change was that it was a clarification of primary responsibilities and moved a sentence.
5. Section 17.2.2.2.2 was revised to clarify that implementing procedures, including operating procedures are reviewed either directly or during audits and surveillance by Nuclear QA personnel. Previously, the sentence used the words "reviewed by Nuclear QA personnel". The basis for this change was that the revision makes this section consistent with Section 17.2.6 which already addresses QA review of procedures as being either directly or by audits and surveillances. The program requirements described in Section 17.2.6 were in effect when Fermi 2 was licensed in 1985.
6. Section 17.2.3 was changed to remove plant performance from the list of responsibilities of the scope of modifications by Plant Engineering. This change was the result of a proofreading error; however, the removal of the phrase from the statement does not

change the elements or scope of the QA program. The remainder of the section describes the process used to achieve and maintain design control and includes the function of performance history in Item b. Also, the sentence had been confusing and subject to multiple interpretations; the modified wording provides clarification.

7. Section 17.2.4.1, second paragraph, was revised to change the title from Nuclear Materials Management to Material Engineering. QA was removed from inline review of procurement documentation as a result of correspondence in References 4 and 5 with prior NRC approval.
8. Section 17.2.4.1 was revised to state that procurement packages are prepared or initiated by the responsible individual vs. the responsible supervisor as previously stated. This change places responsibility on the proper level of person for initiation. The basis for the change was that the initiation responsibility was being made at the proper level and reviews are unaffected by this change.
9. Section 17.2.7 was revised to delete the specific mention of Purchasing Department inspectors and audits of records in some instances to verify the credibility of vendor certifications. The reason for the deletion was to allow for use of audit reports to qualify vendors as already stated in Section 17.2.18.2. The basis included that this change provided consistency with Section 17.2.18.2 and that by eliminating terminology "Purchasing Department Inspectors", the sentence clearly allows inspections to be conducted by Nuclear QA inspectors, which is what is usually done if inspections are conducted. Nuclear QA inspectors meet qualification requirements per Section 17.2.10.
10. Section 17.2.14 was revised to clarify which procedures Nuclear QA reviews and that Nuclear QA keeps informed of scheduled plant activities rather than stating they must be kept informed. The basis for this change included that the clarification was consistent with Section 17.2.6.
11. Section 17.2.16 was revised to state that Nuclear QA or Safety Engineering review all corrective action documents rather than specifying this only as a Nuclear QA function. The bases for the change was that it provided consistency with Sections 17.2.1.4.2 and 13.1.2.1.1 regarding Safety Engineering responsibilities for review of the corrective action program. (The need for this change was identified in a QA audit).
12. Section 17.2.16 was revised to clarify when the Plant Manager is notified of unsatisfactory progress in the corrective action program. The basis included that this clarification has the

Plant Manager being notified at a time when attention is needed to ensure adequate corrective action.

13. Section 17.2.18.2 was revised to add the word "audit" before "results" to clarify which results are reported to the Director, Nuclear Quality Assurance and others. The basis of the change was that it was a clarification.
14. Section 17.2.18.3 was revised to clarify how Nuclear QA reviews procedures, drawings and other documents to verify correct revisions are being used when performing an activity. The basis for the change was clarification to make this section consistent with Sections 17.2.5 and 17.2.6.
15. Table 17.2-1 was revised because the organization changes revised which groups' procedures covered portions of the 18 criteria. In summary, the bases concluded the changes were acceptable since they were consistent with the organization changes which were determined to be acceptable.
16. Section 17.2.1.5.1 was revised to delete the responsibility of monitoring initial startup test activities. The basis included that the startup test program was completed approximately 4 years earlier, so it is appropriate to remove the responsibility since no further actions are involved.