Wayne H. Jens
Vice President
Nuclear Operations

Detroit Edison

2000 Second Avenue
Detroit, Michigan 48226
(313) 586-4150

September 28, 1984
EF2-70023

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: Fermi 2
NRC Docket No. 50-341

Subject: Detroit Edison Response
Inspection Report 50-341/84-19

This letter responds to the item of noncompliance described in your Inspection Report No. 50-341/84-19. This inspection was conducted by Messrs. P. M. Byron, M. E. Parker and G. Caskett on June 16 through July 31, 1984.

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 enclosed response is arranged to correspond to the sequence of items cited in the body of your report. The number for the item of noncompliance and the applicable criterion is referenced.

We trust this letter satisfactorily answers the concerns raised in your report. If you have questions regarding this matter, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

WR Hallard /WRS

cc: Mr. P. M. Byron
Mr. G. Caskett
Mr. R. C. Knop

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THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

Response to NRC Report No. 50-341/84-19

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

Inspection at: Fermi 2, Newport, Michigan

Inspection Conducted: June 16 through July 31, 1984

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-19

Statement of Noncompliance, 84-19-03, Criterion XV

10 CFR 50, Appendix B, Criterion XV, as implemented by DECo Operational Quality Assurance Policy 15, Nonconforming Materials, Parts or Components, Revision 0, dated June 15, 1982, states controls shall be established for the identification and documentation of nonconforming items.

DECo Plant Operations Manual Procedure 12.000.52T, Nonconformance Report (NCR), Revision 1, Dated April 25, 1984, Section 3.1 states that all personnel discovering nonconformances shall initiate an NCR.

Contrary to the above, the licensee dispositioned seven Duke Construction Assessment Team (CAT) findings which identified nonconforming conditions by using other than NCRs.

Corrective Action Taken and Results Achieved

In the early stages of the Construction Assessment, an NRC inspector examined the 21 findings that had been identified and Edison's corrective action. The inspector identified that 7 of these items appeared to require that a Nonconformance Report be issued in accordance with the requirements of POM 12.000.52T, "Nonconformance Report."

Immediately after Detroit Edison management became aware of this situation, a five member Nuclear Quality Assurance (NQA) group was assigned to assist the Edison Construction Assessment Support Team (CAST) review the concerns originated by the CAT. The CAST Program involved a three-step process whereby findings and observations identified by Duke personnel were documented on CAT forms. These reports were then evaluated and preliminary dispositions were noted. The program required that confirmed findings meeting NCR reporting criteria be processed under the Fermi-2 QA program using an NCR. The CAT audit resulted in 199 findings or concerns. Of these, 84 were determined to be and were documented on NCR's. This included 5 NCR's which resulted from the evaluation of the 7 potential nonconformances identified by the NRC inspector.

Corrective Action Taken to Avoid Further Nonconformance

The Quality Assurance Program and implementing procedures for nonconformance reporting are being reviewed to assure that all Fermi 2 organizations are using consistent and correct methods to identify, report and disposition noncomforming conditions.

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-19

Corrective Action Taken to Avoid Further Noncompliance (Cont'd)

Training will be provided to applicable site personnel and Edison Generation Engineering supervisors and task leaders on the requirements for identifying, reporting and dispositioning NCR's.

Date When Full Compliance Will be Achieved

Full Compliance will be achieved by fuel load.