

DMB

November 1, 1984

Docket No. 50-341

The Detroit Edison Company
ATTN: Wayne H. Jens
Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

Attached is a copy of the comments generated by Region III on your letter to Region III and Duke Power Company dated September 20, 1984, titled "Response to Recommendations Arising from Duke Power Report on Final Assessment of Construction." These are the comments that were discussed with you in a meeting at the Fermi site on October 31, 1984.

As stated during that meeting, Region III will generate an inspection report covering each of the items stating as to whether a supplemental response is required or if information provided to the Region at the meeting adequately covered the issue.

Should there be any questions contact P. Byron or R. Knop of my staff.

"Original signed by R. F. Warnick"

R. F. Warnick, Chief
Projects Branch 1

Attachment: As stated

cc w/attachment:
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DATE ▶	11/1/84	11/1/84					

Comments for Discussion During Meeting on 10/31/84

1. As a general comment, the report did not discuss a schedule for completion of DECO actions, especially with respect to items termed "long range plans." The Region is concerned that some items will not be completed in time to meet critical milestones such as fuel load.
2. Section 3.1.2.b clarify as to whether you will have all tray support design documents incorporated into original drawings and specifications at the time of turnover to nuclear production. The term "project objective" does not define a commitment.
3. Section 3.3.2.b - In paragraph 4 DECO treats the apparent drafting error as an isolated case. As identified in NRC inspection report 50-341/84-21, page 12, para. 8.m., several Duke findings were characterized by DECO as drafting errors. This appears to be indicative of a potential problem in DECO's drawing check, review, and approval process which has not been addressed by DECO.
4. Section 3.6 - DECO's response to this recommendation is not acceptable as written because:
 - a. The design engineer's re-evaluation of structural integrity of the shore barrier is not supported by a comprehensive analysis of why the significant design versus construction deficiencies are acceptable and

what actually is the root cause of the variance (the designer's evaluation concludes the structure can withstand probable maximum meteorological event refers to top elevations only).

- b. The proposed additional survey monitoring points are not sufficient in themselves to yield adequate evaluation data for comprehensively evaluating the structural integrity.
5. Section 3.7.2.a and b - DECO does not address the honeycomb concrete identified by Duke around the frame of watertight door R-1-8.
6. Section 3.9.2.a - The second paragraph indicates that the radiographs may have been damaged prior to turnover from the contractor. Was this damage detected by QA during the turnover review? If not, why?
7. Section 3.9.2.c.2 - The basis for selection of the sample of additional containment penetration welds to be examined by DECO was not discussed. The sample size selected seems small in comparison with the Duke sample of 26 welds and with respect to the total population of such welds.
8. Section 3.13.2.b.2 - What is engineering's definition of "adequate thread engagement"? If this does not agree with site specification, either the specifications must be changed or each bolted connection that does not meet site specifications must be identified and dispositioned using approved site procedures.

9. Section 3.16 - Cable trays should be included in the cleanup program described by DECO.

10. Section 3.18.2.a.2 - DECO needs a better basis for concluding that a generic problem concerning control room panel wiring does not exist. DECO statement that: "this case was compared to similar modifications performed in the control room to identify if a generic problem existed. In all cases, the field modification request requirements were clear in specifying quality control inspection and point-to-point continuity testing. The work was done using a traveler requiring review and approval by Field Engineering, Startup and Quality Control. Functional testing of valves from the main control room on various systems confirms that no such problem exists in the main control room." Based on the assigned NRC observer's understanding of the circumstances surrounding this matter, the exact same statement could be made concerning the switches in the remote shutdown panel which were found to be miswired. The FMR for those modifications also required inspection, test, and review. However, because of the way the documentation was completed, a reviewer would not identify that the required inspection and test had not been accomplished.

In addition, the circumstances that allow a small group of people to decide not to implement QA program requirements and not to modify inspection and test records to accurately reflect the activity that was performed needs to be reviewed by the applicant such that recurrence is precluded.

11. Section 3.18.2.b.1 - DECO should re-inspect spring adjustments on all of the scram valves to assure that the springs are well seated and inspect each scram valve stem for proper seating and absence of damage.
12. Section 3.18.2.b.2 - DECO states "that there were no other instances of miswiring where a problem similar to that on valve E1150-MO-F009 may have been created." However, section 3.18.2.a.2 of the DECO report mentions similar problems with E1150-MO-F008.
13. Section 3.19 - A review of QC inspection procedure implementation for electrical cables and component installation/testing should be conducted to determine why these discrepancies were not found during QC inspection and to determine if there are shortcomings in other areas. (This may be applicable for items 17, 18, 19, 20, and 22.)
14. Section 3.19.1 - DECO should verify that the starter size is current for valve E1150F009.
15. Section 3.19.2.b -
 - (1) How have all DECO personnel (test engineers, craftsmen, etc.) been made aware of the fact that specification 3071-128 section EJ is the lead document taking precedence over all related design drawings?
 - (2) DECO states "In time, fuse size and type for each QA Level I application will be eliminated from other engineering documents."

In addition to the 24 specific recommendations provided by Duke Power in section 6.0 of the Duke report, there were recommendations made throughout the report that were not included in the 24 recommendations but should be addressed by DECO. The following are examples of recommendations made by Duke Power but not addressed in the DECO response report:

- (1) Page 110 of the Duke report Section 3.7.4.5 recommends that DECO look at each support on both the RHR Heat Exchangers and the EECW Heat Exchangers to assure that all clearances required for proper installation of the sliding supports and guides are met.
- (2) Page 129 of the Duke report Section 3.8.2.4(3) recommends the use of filters or trash screens for protection of the control air compressor room internal cooling coils.
- (3) Page 151 of the Duke report Section 3.11.3.5 recommends "that a generic procedure be developed and implemented, prior to fuel loading, requiring periodic checks of penetrations for gas pressure fluctuation and damage."