NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2 Nuclear Plant

Docket No. 50-341
License No. NPF-43

During an NRC inspection conducted from September 22 through November 21, 1995, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600 (60 FR 34381; June 30, 1995), the violations are listed below:

1. a. 10 CFR 50, Appendix B, Criterion V, "Instruction, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type of appropriate to the circumstances and shall be accomplished in accordance with these instruction, procedures, or drawings.

   Contrary to the above, as of October 3, 1995, Maintenance Procedure 35.309.001, Revision 29, 130/260 Volt Battery Charger Testing, Calibration and General Maintenance, approved April 3, 1995, an activity affecting quality, was not appropriate to the circumstances. Specifically, the procedure was not sufficient to prevent the installation of a test resistor bank on the Division 1 130/260 Volt Battery, which rendered the battery inoperable and did not notify the operating crew of the condition.

   b. Operations Conduct Manual, MOP05, Control of Equipment, Section 2.3.5, states in part, "Restoring a system and/or component to operable condition shall be accomplished by successful completion of maintenance, operations procedure requirements, and surveillance as required by the NSS/NASS." This is an activity affecting quality.

   Contrary to the above, on October 3, 1995, the 2A-1 Battery Charger was placed in service without completing maintenance activities pursuant to the NSS/NASS.

This is a Severity Level IV violation. (Supplement 1)(341/95012-04)

2. a. 10 CFR 50, Appendix B, Criteria XVI, "Corrective Actions," requires in part that in the case of significant conditions adverse to quality, measures shall be established to assure that the cause of the condition is determined and corrective action taken to preclude repetition.

   Contrary to the above, on October 3, 1995, the use of inadequate work procedures and failure to follow work process control procedures resulted in rendering the Division 1 130/260 Volt Battery inoperable, a significant condition adverse to quality. Corrective actions for previous significant events caused by similar inadequate work control practices failed to prevent this occurrence. Events caused in part by inadequate work control and failure to follow

work process control procedure include the valve stem ejection event on September 17, 1993, and an unexpected change in reactor vessel level and pressure indication due to inappropriately installed monitoring equipment on February 11, 1995. (341/95012-02a)

b. 10 CFR 50, Appendix B, Criterion XVI, required, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

Contrary to the above, from May 1994 to November 1995, the licensee failed to implement adequate corrective action to preclude continued corrosion deterioration of safety related battery racks. The deterioration identified during a surveillance in May 1994 in one location on one rack was not corrected until the NRC identified corrosion deterioration on all the racks in November 1995 (341/95012-02b).

This is a Severity Level IV violation. (Supplement 1)

3. Technical Specification 6.8.1.a required that written procedures be established, implemented, and maintained for applicable activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2.

Regulatory Guide 1.33, Revision 2, Appendix A requires in part that written procedures be established for startup, operation, and shutdown of safety-related systems, including the control rod hydraulic system.

Procedure 23.106 Control Rod Drive Hydraulic System, Section 5.4.1.2 requires that nitrogen bottles with pressure greater than 1200 psig be used for recharging control rod drive hydraulic control unit (HCU) accumulators.

Contrary to the above, between August 9 and October 19, 1995, the licensee failed to implement Procedure 23.106 in that at least 9 HCU accumulators on the north HCU bank were not recharged with nitrogen, but were recharged with argon gas a total of at least 34 times (341/95012-03).

This is a Severity Level IV Violation. (Supplement 1)

Pursuant to the provisions of 10 CFR 2.201, Detroit Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the

corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Lisle, Illinois
this 12th day of December 1995