

NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2 Nuclear Plant

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

During an NRC special inspection conducted from October 18 through November 23, 1995, violations of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600 (60 FR 34381; June 30, 1995), the violations are listed below:

1. Technical Specification 6.8.a. required that written procedures shall be established, implemented, and maintained covering activities for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Section 9.e (1) requires, in part, the procedures for the control of modifications should include...method for obtaining permission and clearance for operation personnel to work...

Fermi 2 Interfacing Procedure, FIP-CM1-12, Revision 4 (dated April 18, 1991), "Engineering Design Packages," Section 5.1 requires, in part, that "all QA Level 1 and IM Engineering Design Packages (EDPs), generated to modify systems, structures, or components contained within...(5.1.1 Reactor Building), shall be designated as Type 1 EDPs, and shall be generated in accordance with all applicable requirements of the procedure."

Contrary to the above, during June 1991, a supervisor, the Refuel Floor Coordinator modified a Reactor Building component, specifically the New Fuel Uprighting Stand, by removing the mounting anchor bolts without generating a Type 1 EDP.

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

2. Technical Specification 6.8.a. required that written procedures shall be established, implemented, and maintained covering activities for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Section 9.c requires that procedures for the repair or replacement of equipment should be prepared prior to beginning work.

Nuclear Production - Fermi 2 Administrative Procedure, NPP-MA1-01, Revision 7 (dated December 11, 1991), "Work Control," Section 5.1 requires, in part, that "maintenance activities on Important Work, which is defined as any maintenance or modification activity performed on plant systems, structures or components that is Tech Spec related, QA Level I or IM or requires a permit such as a Protective Tagging, Welding, etc., shall be completed through planned Work Requests.

Furthermore, Work Requests are required for repairs and rework of plant systems, structures and equipment as described..."

Contrary to the above, on August 30, 1992, a licensee's supervisor, the Refuel Floor Coordinator repaired the New Fuel Transfer Crane without a Work Request.

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

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 the 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 6th day of December 1995