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September 10, 1984  
EF2-72793

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

PRINCIPAL STAFF	
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<del>DRMA</del>	<del>FILE</del>

Dear Mr. Keppler:

Reference: Fermi 2  
NRC Docket No. 50-341

Subject: Noncompliance at Fermi 2  
Inspection Report 50-341/84-30

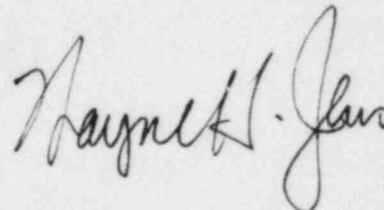
This letter responds to the item of noncompliance described in your Inspection Report No. 50-341/84-30. This inspection was performed by Mr. J. Norton on June 27-29, and July 10-12, 1984.

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.

We trust this letter will satisfactorily respond to the noncompliance cited in your report. If you have questions regarding this matter, please contact Mr. Lewis P. Bregni, (313) 586-5083.

Sincerely,

cc: Mr. P. M. Byron  
Mr. R. C. Knop  
Mr. J. Norton



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THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

Response to NRC Report No. 50-341/84-30

Docket No. 50-341

License No. CPPR-87

Inspection at: Fermi 2, Newport Michigan

Inspection Conducted: June 27-29, 1984 and July 10-12, 1984

Statement of Noncompliance 84-30-01, Criterion XVI

10CFR50, Appendix B, Criterion XVI, as implemented by Detroit Edison's Enrico Fermi Atomic Power Plant Unit 2 FSAR, Volume 9, Section 17.1.2, Paragraph q., and the Quality Assurance Manual, Enrico Fermi Power Plant Unit 2, Policy 17.0, Paragraph 17.0.1, require that appropriate and prompt corrective action be taken when conditions adverse to quality are identified.

Contrary to the above, Deviation Disposition Request No. C-12154, addressing shore barrier structure configuration deviations from design requirements, was improperly and inadequately dispositioned in that:

- a. The recommended FIELD PROPOSED DISPOSITION was "use-as-is" even though supporting data clearly showed that construction tolerances were significantly exceeded.
- b. The supporting data was misleading and contained errors of omission.
- c. The dispositioning was based on data which evidently was not analyzed thoroughly.

Corrective Action Taken and Results Achieved

Statement of Nonconformance 84-30-01 bases its conclusion that Deviation Disposition Request (DDR) C-12154 was improperly and inadequately dispositioned on three observations. Detroit Edison has re-evaluated its disposition of this DDR in light of these observations.

- a. "The recommended Field Proposed Disposition was "use-as-is" even though supporting data clearly showed that construction tolerances were significantly exceeded."

This observation is correct in that the construction tolerances were exceeded and that the disposition was "use-as-is." The disposition of DDR C-12154 was based on the unstated determination that the elevation was satisfactory where the barrier meets the fill for the entire length of the barrier and that the construction tolerance, as it applies to the full width of the barrier, was more restrictive than necessary. Since the elevation was satisfactory at fill for the full length, the barrier would meet its design function of maintaining the fill. A tolerance of + 6 inches for the placement elevation of randomly shaped rock with typical dimensions of 3 feet to 5 feet was not necessary for the structure to fulfill its intended purpose. Modification of the structure to comply with the specified construction tolerance was and still is judged to be unnecessary.

The disposition of DDR C-12154 was based on an analysis of the elevation at eleven stations which revealed an average variation of minus 0.75 feet. As a result of the NRC concern, a second evaluation was conducted by the shore barrier design engineer, R. M. Noble of R. M. Noble Associates in July 1984. Elevation variations at the eleven stations of DDR C-12154 and the elevation variation at the lowest part of the shore barrier (N6864) were considered. Mr. Noble's evaluation, reported in the attachment to Dames & Moore letter DMO-01, confirmed the adequacy of the "use-as-is" disposition.

- b. "The supporting data was misleading and contained errors of omission."

DDR C-12154 considered data taken at pre-determined survey points. The survey points were selected at 100 foot intervals along the entire length of the shore barrier starting with the first full cross section at station N6800. This approach and interval spacing complied with the commitment made in FSAR Appendix E5 item 321.5.

As a result of the NRC concern, Nonconformance Report (NCR) 84-1081 dated July 18, 1984, was written to document the fact the DDR C-12154 did not account for the greatest variations in elevation. The evaluation of NCR 84-1081 included data at worst case locations (N6864). This data was evaluated by the shore barrier design engineer and the shore barrier was found to be acceptable because it would meet its design function of protecting the site fill.

- c. "The dispositioning was based on data which evidently was not analyzed thoroughly."

This observation addresses the dispositioning engineer's justification for dispositioning the DDR based on engineering judgement and not revising the design calculation.

The design calculation considers only the height of the barrier at the fill and the weight of the individual rocks. Since low elevations were found only at the leading edge of the barrier, revisions to the calculation were not considered necessary. This conclusion is supported by the re-evaluation performed by R. M. Noble.

#### Corrective Action Taken to Avoid Further Noncompliance

Personnel involved in the dispositioning of DDR C-12154 will review appropriate Fermi 2 procedures for dispositioning nonconformances. These procedures state the need to provide a documented technical justification to substantiate that "use-as-is" dispositions will not adversely affect the ability of an item to perform its intended function. Additionally, these procedures require that dispositions which affect configuration be submitted for approval to the organization responsible for design.

Date When Full Compliance Will be Achieved

The Architectural-Civil Supervisor and work leader will document the fact that they have re-read the appropriate procedures for dispositioning nonconformances by September 14, 1984.