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September 17, 1984
EF2-69712

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: Noncompliance at Fermi 2
Inspection Report 50-341/84-25

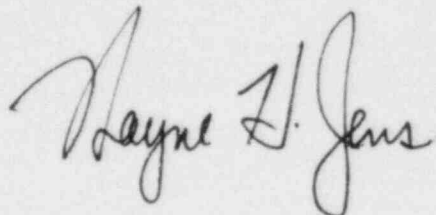
This letter responds to the item of noncompliance described in your Inspection Report No. 50-341/84-25. This inspection of activities regarding the Operational Quality Assurance Program at Fermi 2 was performed by Messrs. R. Hasse and R. Smeenge on June 5-15, 20-22, and July 9-20, 1984.

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 are referenced.

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. A. Hasse
Mr. R. C. Knop

THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC REPORT NO. 50-341/84-25

DOCKET NO. 50-341 LICENSE NO. CPPR-87

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: JUNE 5-15, 20-22, AND JULY 9-20, 1984

Statement of Noncompliance, 84-25-10, Criterion V

10 CFR 50, Appendix B, Criterion V, as implemented by Detroit Edison Nuclear Quality Assurance Program, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, the licensee failed to maintain a correct and up-to-date Temporary Modification Log in the Tagging Center as required by Paragraph 5.3 of POM 12.000.25T.

Corrective Action Taken and Results Achieved

NRC noncompliance item 84-25-10 identified four (4) temporary modifications which were not accurately reflected on the Temporary Modification Record (TMR) forms or the Temporary Modification (TM) Logsheets. The items cited and corrective action performed are as follows:

1. TMR 587 (Lifting of 56 leads) - The TM record indicated that all but two leads had been returned to normal. In fact, the two leads had been reconnected and the tags were removed. The TM record and TM log did not reflect the actual modification status.

Action taken: The two tags identified as being in place have been field verified as removed. The TM record and TM log were updated on July 19, 1984 to reflect that the temporary modification was restored to normal.

2. TMR 265 - The TM record indicated that the tags had been removed from the modification and the sign-off indicated that the system had been returned to normal on April 28, 1984. In fact, the tags had been removed and the modification returned to normal. The TM log did not reflect the actual modification status.

Action taken: The TM logsheet has been updated to reflect the current status of the temporary modification.

3. TMR 470 (Installation of a screen in an inlet system of the diesel generator) - The TM record indicated that the system had been returned to normal on April 23, 1984. In fact, the system had been returned to normal and the tags had been removed. The TM log did not reflect the actual modification status.

Action taken: The TM logsheet has been updated to reflect the current status of the temporary modification.

Corrective Action Taken and Results Achieved (Cont'd)

4. TMR 482 (Lifting leads at two relays) - The TM record did not indicate that the system had been returned to normal. Two tags remained on the modification; however, the tags were identified as TMR 16095. TMR 16095 specified the modification for the preoperational phase rather than during construction. TMR 482 remained open in the TM log, although it had been superceded by TMR 16095.

Action taken: TMR 482 indicates that the system was returned to normal on April 24, 1984. Operations has reverified that the system had been returned to normal, and the TM log has been updated to clear the subject TM record. TMR 16095 did not supersede TMR 482; it was issued to support preoperational testing. TMR 16095 was cleared on July 18, 1984.

Corrective Action Taken to Avoid Further Noncompliance

1. A complete review of all outstanding temporary modifications is being performed. For each case where a temporary modification is still needed, a new TMR will be processed (including the installation of new temporary modification tags) and the old TMR will be closed (including the removal of all old TMR tags).
2. A temporary change (T0569) was issued against procedure 12.000.25T "Interim Temporary Modifications Procedure" to reflect the following changes:
 - a. Processing of a temporary modification will be performed only at the Tagging Center.
 - b. There will only be a 30 day lifetime for TMR's unless an extension is approved by the Operations Engineer.

Date When Full Compliance Will be Achieved

The procedure changes have been issued. The review of temporary modifications is expected to be complete in October of 1984.