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January 18, 1985  
EF2-70233

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: Detroit Edison Response  
Inspection Report 50-341/84-46

The attached report responds to the item of noncompliance described in your Inspection Report No. 50-341/84-46. This inspection was conducted by Messrs. S. G. DuPont, D. E. Hills and Ms. P. L. Eng of NRC Region III between November 5 and 29, 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 appropriate criterion and the number identifying the item are referenced.

We trust this letter satisfactorily responds to the item of noncompliance cited in the inspection report. If you have questions regarding this matter, please contact Mr. Lewis Bregni, (313) 586-5083.

Sincerely,

cc: P. M. Byron  
R. C. Knop  
USNRC Document Control Desk  
Washington, D.C. 20555

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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC REPORT NO. 50-341/84-46

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

INSPECTION AT: FERMII 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: NOVEMBER 7 through 29, 1984

Statement of Noncompliance 84-46-01

10 CFR 50, Appendix B, Criterion V as implemented by DECo Quality Assurance Manual, Section 9.01 and American National Standard N18.7-1976, Section 5.2 requires that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.

Contrary to the above, plant operating procedure POM 47.309.02 and maintenance instruction MI-E0039 were not of a type appropriate to the circumstances such that they were inadequate in collecting data for equalizing charges of safety-related batteries.

Corrective Action Taken and Results Achieved

Procedure 47.309.02 was written to allow the performance of a special equalizing charge on the safety-related 130/260 VDC batteries. This test was developed to provide a means to equalize charge the safety-related 130/260 VDC batteries at a higher than normal voltage in a one time attempt to raise the specific gravity of the batteries to within acceptable Technical Specification range. Due to an oversight, the initial and final data was not recorded while the battery was in the same state. The initial data was recorded with the battery charger de-energized with no load on the battery, and the final data was recorded with the battery on float charge with no load. This oversight results in nonuniform data which is difficult to trend. Procedure 47.309.02 "Equalizing Battery Charge Test" has been canceled.

The equalize charge performed in Procedure 47.309.02 did not increase the specific gravity as expected. As a result it was decided to add electrolyte to the safety-related 130/260 VDC batteries in order to raise the specific gravity, therefore, Maintenance Instruction MI-E0039 was specially written to change the specific gravity. The method for exchanging electrolyte calls for the battery to be on equalize charge during the electrolyte exchange. Immediately after the electrolyte was exchanged, the battery was to be equalize charged for a 24-hour period to enhance the mixing of the newly added acid. After the electrolyte had been added and prior to the 24-hour equalize charge, the specific gravity and cell voltage was measured. After the 24-hour equalize charge, the battery was placed in float charge and the specific gravity and cell voltage were measured again. This accounts for the noncomparable data that was recorded. The specific gravity responded as expected due to the mixing of the newly added acid.

Corrective Action Taken and Results Achieved (Cont'd)

The intent of MI-E0039 was to change the specific gravity of the battery not to determine the state of charge. It was intended to use this maintenance instruction only once, therefore, Maintenance Instruction MI-E0039 "Changing Specific Gravity of 130/260 VDC Batteries" has been canceled.

Corrective Action Taken to Avoid Further Noncompliance

Plant surveillance procedures related to the safety-related 130/260 VDC batteries have been reviewed to ensure that the initial and final data is recorded when the battery is in the same state.

Date When Full Compliance Will be Achieved

Based on the review of existing battery surveillance procedures, full compliance has been achieved.