

**Detroit
Edison**

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February 18, 1985
EF2-70385

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 50-341/84-62

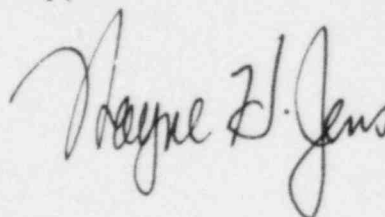
The attached report responds to the items of noncompliance described in your Inspection Report No. 50-341/84-62. This inspection was conducted by Messrs. Z. Falevits, A. Gautam, R. Mendez, J. Norton, and K. Tani of NRC Region III on November 28-30 and December 5 and 10, 1984.

The items of noncompliance are 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 noncompliances 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
C. C. Williams
USNRC Document Control Desk
Washington, DC 20555



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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-62

DOCKET NO. 50-341

LICENSE NO. CPPR-87

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: NOVEMBER 28-30, 1984 AND
DECEMBER 5 AND 10, 1984

Statement of Noncompliance 84-62-01

10 CFR 50, Appendix B, Criterion VI, as implemented by DECo QA program requirement QAPR 6, Rev. 1, Section 6.1, requires the licensee to take measures to control the issuance of documents prescribing activities affecting quality, and to assure that documents, including changes are reviewed for adequacy and distributed to and used at the location where the prescribed activity is performed.

Contrary to the above:

- a. The licensee failed to establish a complete set of drawings, essential for the safe operation of the plant, required in the control room and in the tagging center. It was apparent that the licensee had not reviewed the control room drawings for adequacy, and had not distributed required drawings at the location of activity.
- b. The licensee failed to establish a permanent controlled location and format for the drawings in the control room. For example, drawings were found randomly stacked on a desk in the control room. The licensee had also apparently not decided if full size drawings were to be included in the set. This indicated a lack of adequate control of these documents.
- c. The licensee failed to control the issuance of drawing revisions in the control room and tagging center. Six of the eleven drawings reviewed in the control room had an incorrect revision status. For example, the control room set of drawings included drawing 721 I-2336-26 Revision E when the latest correct revision status of this drawing was Revision F, issued August 28, 1984. This indicated failure to maintain current revision status of subject drawings.
- d. Various P&ID drawings in the control room were found to have a lack of clarity. For example, various sections of drawing 6M721-2081 Revision M, due to the reduced size of the drawing and excessive information, could not be read for valve numbers. Because of this lack of clarity, these documents are apparently not adequate to perform the prescribed activities.

Corrective Action Taken and Results Achieved

- a. At the time the NRC inspector reviewed the drawings in the control room, Detroit Edison did not have a formal drawing list. However, an informal list did exist at the time and was subsequently issued in a Fermi 2 power plant order. EFP-1077 "Control Center Drawings" was issued December 1, 1984, immediately after the NRC exit meeting. The plant order specifies the list of drawings that are to be controlled and maintained in the control room and tagging center. The list of drawings cannot be modified without the approval of the Superintendent or his delegate.

Both the control room and tagging center are on controlled distribution for the drawings specified in the plant order. These drawings and changes to them are being maintained to the current revision.

- b. Control room drawings consist of a set of one-half size mylars and some blue line prints. The mylars were especially developed for use in the control room because they allow the operators to operationally status the drawings with grease pens and can be erased without removing the original information on the drawing. Whenever drawing revisions are issued, a new mylar is made and sent to the control room. These drawings require extra time to make and are therefore sometimes preceded by blue lines. The blue line is removed and replaced by the mylar when the mylar arrives.

The one-half size mylars, a set of functional operating sketches, and associated change paper are bound. These and the expandable file folders containing full-size blue line drawings are kept in an orderly manner in the control room.

When the inspector reviewed the control center drawings one-half size mylar drawings were in use. It has been decided to continue the use of one-half size mylars.

- c. The entire set of drawings and design change document files in the control room and tagging center were reviewed for correct revision and posting of changes. Discrepancies were documented and corrected. The drawings in both areas are being maintained to the current revision.

Corrective Action Taken and Results Achieved (Cont'd)

- d. Detroit Edison has elected to continue the use of one-half size mylars for use in the control room because of their utility to the operators. However, recognizing the clarity problem posed by the reduced size, a review was done of all reduced drawings. Several, including 6M721-2081, were deemed unacceptable as to legibility and have been replaced.

Corrective Action Taken to Avoid Further Noncompliance

Information Systems Work Instruction ISWI 00.40.98 "Control Center Documents" was issued to provide more detailed instruction for maintaining documents in the control room and tagging center. The instruction identifies responsibilities and gives specific instruction for processing documents in the control center.

The instruction:

1. specifies EFP-1077 as the control center drawing list;
2. identifies the proper facility for each type of document; and
3. describes the manner in which changes are posted and drawings updated.

Nuclear Administration personnel assigned to the maintenance of control center documents, as well as their work leaders and supervisors, have been given informal training on this work instruction. The importance of maintaining accurate documentation in the control center has been reinforced.

In addition, Nuclear Administration presently reviews control center documentation monthly to verify that the drawing set is complete, up to date, and contains all posted changes. The results of the latest review indicated that the control room and tagging center drawings are accurate.

Nuclear Administration will continue periodic review of the control center documents to ensure accuracy. Control center document accuracy is subject to audit and surveillance by Nuclear Quality Assurance.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Statement of Noncompliance 84-62-02

10 CFR 50, Appendix B, Criterion V, as implemented by DECo Quality Assurance Manual, Section 9.0.1 requires that activities affecting quality be prescribed by appropriate written instructions, procedures and drawings and be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, as installed wiring of protective undervoltage relays 27ZX, 27YZ and 27XY, mounted in position 1A of 480V safety-related switchgear 72F and undervoltage relay 27XY, mounted in position 1A of safety-related switchgear 72E, did not conform to wiring diagrams 6SD721-2511-50, Revision "K", and 6SD721-2511-43, Revision "H" respectively. For example a jumper shown on wiring diagram was found missing in the field and routing of wires between termination points in the field did not match wiring shown on the wiring diagrams.

Corrective Action Taken and Results Achieved

The inspection report identifies discrepancies between the installed wiring and the drawings for undervoltage relays in 480 volt switchgear 72F, position 1A, and 72E, position 1A. These discrepancies, which were correctly described by the inspector, were evaluated and found to have no effect on the operation of the components powered by this switchgear.

For switchgear 72F, position 1A, the installed wiring is functionally equivalent to the wiring shown on drawing 6SD721-2511-50, Revision K; although, the routing of wires between termination points in the field does not exactly match the wiring shown on the drawing. Since functionally equivalent wiring has no effect on the operation of the equipment, these discrepancies were not detected when the system was tested. To correct these discrepancies, the drawing will be reconciled to agree with the installed wiring. To prevent confusion to operations and maintenance personnel, the Deviation/Event Report which documents this discrepancy will be posted against the drawing until the drawing is reconciled.

Corrective Action Taken and Results Achieved (Cont'd)

For switchgear 72E, position 1A, drawing 6SD721-2511-43, revision H shows a jumper which should have been removed from the drawing when the undervoltage/overvoltage relay was replaced with an undervoltage relay. The jumper is not installed in the field and, since functional operability was not affected, the discrepancy was not detected when the system was tested. The drawings will be reconciled to agree with the installed wiring. To prevent confusion to operations and maintenance personnel, the Deviation/Event Report which document this discrepancy will be posted against the drawing until the drawing is revised.

Corrective Action to Avoid Further Noncompliance

Detroit Edison has recently completed extensive walkdowns of electrical and instrumentation and control equipment in order to identify, document and evaluate discrepancies between the as-built plant and the wiring drawings. This program has provided assurance that deviations which affect the operation of equipment have been identified and corrected; and deviations which could cause confusion have been documented and posted against the appropriate design documents. This program also included the identification of the root causes of the as-built drawing discrepancies. The actions taken to prevent recurrence will be addressed in Detroit Edison's response to 10CFR50.55(e) Item 143.

Date When Full Compliance will be Achieved

Full compliance will be achieved in accordance with the program in response to 10CFR50.55(e) Item 143.

Statement of Noncompliance 84-62-03

10 CFR 50, Appendix B, Criterion XV, as implemented by DECo Quality Assurance Manual, Section 15, Rev. 1, requires that measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures should include, as appropriate, procedures for identification and disposition. Nonconforming items shall be reviewed and repaired or reworked in accordance with documented procedures.

Contrary to the above the inspector identified twenty-five missing or burned out breaker position status indicating lights in twenty-one positions of the following safety-related switchgears:

480V switchgear 72B, 72C, 72E, and 72F.
4160V switchgear 64B, 64E, and 64F.

These lights indicate the position of the breaker open (red), closed (green), and the availability of power (amber). No procedures addressing this area were available.

Discussion

This item of noncompliance was cited as a severity level IV violation. Under the circumstances, Detroit Edison considers the severity level to be overly severe, and requests that the violation be changed to a severity level V. In support of this request, please note the the breaker status indicating lights serve no control function, nor does the operability of the indicating lights affect the safety-related function of the switchgear. In addition, the indicating lights are an operator aid and serve only as a backup to the mechanical targets.

Corrective Action Taken and Results Achieved

After the NRC inspector notified Detroit Edison of the above condition, a walkdown was performed of all 4160 and 480 volt switchgear. Any burned out or missing breaker status indicating lights were replaced.

Corrective Action Taken to Avoid Further Noncompliance

Job Instructional Training (JIT) unit R14-30 "Inspect a 4160V Bus" and R14-33, "Inspect a 480V Bus" provide a description of the steps operators are to take to inspect switchgear. Both JIT's were placed on "Urgent Required Reading" for all licensed operators, and were discussed with all non-licensed operators during shift turnover briefing. Also, JIT R14-33 was modified, consistent with JIT R14-30, to include a step to check indicating lights.

Normal operator practice requires operators to replace missing or burned out indicating lights, and precludes the need for a specific procedure. Replacement lights are available in the plant to facilitate such action. However, the above notwithstanding Detroit Edison has revised the Operator Round Sheets to include a check of breaker indicating lights as part of the operator's rounds.

Date When Full Compliance will be Achieved

Full compliance has been achieved.