Wayne H. Jens
Vice President
Nuclear Operations

Detroit Edison

Fermi-2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-4150

February 18, 1985
EF2-70392

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

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Letter, W. H. Jens to J. G. Keppler,
January 29, 1985, EF2-70231

Subject: Detroit Edison Amended Response
Inspection Report 50-341/84-57

The attached report amends Detroit Edison's response to the item of noncompliance described in your Inspection Report No. 50-341/84-57. The changes from the original response, Reference 2, are identified by revision bars in the right hand margin. This inspection was conducted by Messrs. Z. Falevits, K. Tani and A. Gautam of NRC Region III on November 7-9, 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 is referenced.

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

Sincerely,

Wayne H. Jens

cc: P. M. Byron
R. C. Knop
C. C. Williams
U. S. NRC Document Control Desk
Washington, D.C. 20555

FEB 25 1985

IE01

THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-57

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

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: NOVEMBER 7-9, 1984

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-57

Statement of Noncompliance 84-57-01

10 CFR 50, Appendix B, Criterion III, as implemented by Detroit Edison Nuclear Quality Assurance Manual, Section 3.1.4, requires that measures be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled.

Contrary to the above:

a. The licensee failed to assure that deficiencies in the control logic schematic diagrams of the RHR system are properly identified, corrected and controlled. The following discrepancies were identified in the RHR Shutdown Cooling initiation and valve line up control logic, depicted on schematic diagram 6I721-2201-2 (sic) [6I721-2205-2], Revision J.

   (1) Relay contact interlock transmitting reactor low pressure signal is designated as B21-K202A (M3-T3), indicating it as being part of Nuclear Steam Supply Shutoff System (B21). However, review of the design logic indicated B31-K202A (M3-T3) to be the correct one. (Reactor Recirculation System B31). This was noted by the licensee but the schematic diagram was not revised.

   (2) Reference drawing shown for the B21-K202A coil is specified as 6I721-2095-29. However, review of drawing 6I721-2095-29 indicated that B21-K202A (M3-T3) is a spare contact. (Ref. drawing should have been 6I721-2105-11).

   (3) Description of Reactor Protection System (RPS) relay contact A71B-K17 (13-14) states "closes on reactor low level #3 or high drywell pressure (Ref. 9). However, review of logic indicates that it should state "closes on reactor low level #3 and below."

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/84-57

Corrective Action Taken and Results Achieved

As stated in items 1 and 2, drawing 6I721-2205-2 (identified as 6I721-2201-2 in the Inspection Report), Revision J, incorrectly identified contact B31-K202A as B21-K202A and identified the reference drawing for this contact as 6I721-2095-29 instead of 6I721-2105-11. As identified in item 3, the note "closes on low level #3 or high drywell pressure" was not modified when the logic of the system was changed to delete the drywell pressure function of the contact. Detroit Edison's investigation has determined that these drafting errors had no impact on installed hardware or system testing. The drawing has been revised.

These errors were known to the responsible engineer and were being tracked informally but the actions required by project procedures were not taken and the errors were not corrected. The personnel involved did not believe these errors warranted immediate corrective action and intended to correct the drafting errors during the next revision. Earlier, the contact numbering error had been identified and corrected with a black pen on the copy of the drawing used by the test engineer as the yellow-lined master for this system. The test engineer also did not take the corrective action required.

When the NRC Inspector, who was reviewing the Residual Heat Removal Initiation Logic, expressed a concern about the drawing and requested that a copy be supplied to the Region III Office, he was supplied with a copy with each of the errors identified. When the Inspector returned to the site at a later date, action to correct the drawing still had not been initiated.

Detroit Edison personnel have been indoctrinated in the need for the prompt correction of drawing errors in accordance with existing procedures.

Corrective Action Taken to Avoid Further Noncompliance

Detroit Edison has undertaken an extensive program for verification of electrical and I&C QA Level I design documents. This program, to be described in response to 10CFR50.55(e) Item 143, will assure that Fermi 2 design documents are adequate for plant operation and maintenance.

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.