Appendix

NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2

As a result of the inspection conducted on December 19, 20, 1984, and
January 3-5, and 10-12, 1985, and in accordance with the General Policy and
Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the
following violation was identified:

10 CFR 50, Appendix B, Criterion VI, as implemented by DECo Quality
Assurance Manual, QAPPR 6, Revision 1 requires that measures be taken
to assure that documents such as instructions, procedures, and drawings,

10 CFR 50, Appendix B, Criterion VI, as implemented by DECo Quality Assurance Manual, QAPPR 6, Revision 1 requires that measures be taken to assure that documents such as instructions, procedures, and drawings, including changes thereto, are reviewed for adequacy... and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, the licensee failed to assure that changes and revisions to drawings were adequately distributed, reviewed, and controlled when used in checkout and initial operation (C&IO) testing of safety-related systems.

The following discrepancies were identified:

- a. There was a lack of consistent procedural requirements. (C&IO) Startup Instructions Procedure (SIP) 7.7.2.01 Revision 6 requires that superseded revisions of drawings be filed in the Startup Resource Center, while procedure SIP 4.7.4.02 requires that superseded revisions be thrown away.
- b. Revisions D, E, F, G, H, I and J of drawing 61721-2201-2 did not contain the proper stamping signatures and dates, contrary to procedureSIP 7.7.2.01.
- c. Revision D of drawing 61721-2201-2 was not stamped "superseded" or "testing void" as required by procedure SIP 7.7.2.01 when portions of theschematic had been changed or when subsequent revisions required new testing.
- d. Revisions E and I of drawing 61721-2201-2 were found missing from the files, contrary to procedure SIP 7.7.2.01.
- e. Sections of schematic 61721-2201-2 were observed to be yellow lined indicating that these sections were tested, although there was no evidence that tests had been performed.

8502110494 850128 PDR ADDCK 05000341 G PDR f. There was no one consistent method applied among the startup engineers to document the status of performance of C&IO testing required by procedure SIP 7.7.2.01.

Additional details are provided in paragraph 8.a.(12) of the enclosed inspection report.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

1/28/85

Dated

R. L. Spessard, Director
Division of Reactor Safety