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June 20, 1996
NRC-96-0056

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) NRC Inspection Report No. 50-341/96001,
dated May 8, 1996

Subject: SALP 15 Response

Detroit Edison has reviewed the Systematic Assessment of Licensee Performance (SALP) 15 Report and the comments made by NRC during the SALP meeting on May 21, 1996. We concur that our overall performance has been mixed, and acknowledge that performance in Operations has been inconsistent. We also agree with the individual ratings assigned to each of the four SALP functional areas, and are pleased with the recognition of our Plant Support function as Category 1. Although the category rating for both the Engineering and Maintenance functional areas remained the same, we have initiated changes to improve performance in these areas. We are disappointed that we were unable to sustain the initial improvement seen in the Operations functional area, but agree with the assessment that high visibility events and nonroutine activities are well handled. It is recognized that routine activities continue to represent a challenge to our staff. We are not satisfied with this level of performance and have been implementing improvements as described in this letter to upgrade performance in all functional areas.

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Our review of the report did not identify any discrepancies which require resolution or change. In general, our views do not differ from those expressed by the NRC in the report. As discussed at the SALP meeting, we are taking steps to improve performance in the Operations functional area by building on the excellent performance noted in the area of Plant Support. The strong self assessment culture, staff and management ownership, and teamwork already exhibited by the Plant Support organizations will be amplified in the Operations functional area. Operator workarounds and equipment problems combined with a corrective maintenance backlog induced distractions into otherwise routine activities. Our challenge is to improve the plant design, or modify equipment to permanently correct recurring problems, and reduce the work backlog while maintaining focus such that improved performance can be sustained. A number of initiatives intended to elevate the safety consciousness of the organization, and to enhance the capability to focus on routine daily activities are in progress to address issues mentioned in the SALP report.

A Materials Concern List was created through the combined efforts of Operations and Maintenance to capture, classify, and prioritize problems, and to promote communication between departments to achieve the proper focus. From this list, major distractions including equipment deficiencies and long standing problems which had complicated work schedules, were identified. A number of these were resolved during the recent extended plant shutdown. These items include repairs to the hydrogen cooler in the turbine generator, improvements in the control rod drive position indication, and installation of new pump seals in one Reactor Water Clean Up pump. As a result, operator distractions have been reduced and the plant is operating better. The continued materiel improvement of the plant and the attendant reduction in manpower previously required to maintain this equipment, has reduced challenges and allowed increased focus on daily activities.

Modifications planned for the fifth refueling outage (RF05) in the fall of 1996, will further improve the design and correct other recurring equipment problems. Initial plans include the replacement of all three low pressure turbines; redesign of the General Service Water (GSW) System including the replacement of a number of isolation valves; replacement of high maintenance control room recorders with more reliable and easier to service units; and replacement of all 185 Position Indicating Probe (PIP) cables and connectors. Additionally, a significant upgrade of the Reactor Building Component Cooling Water System will be started. This comprehensive modification will extend beyond the scheduled outage. Teamwork and communication between Operations and Engineering has improved and is a key element to resolving these long term equipment problems. Several outages involving a sustained effort will be required to accomplish our goal of reducing

these issues to a totally acceptable level; however, action taken to date has already reduced the burden on the operating staff and will greatly reduce operator distractions.

Problems with procedure adequacy and attention to detail are being addressed. Very aggressive communications have been made by management to ensure expectations are understood by all personnel. Site wide meetings which included the participation of bargaining unit employees have been held to reinforce management's commitment to improvement. A program to review and revise procedures to facilitate better procedural adherence, and improve procedures is also under way. The present Deviation Event Report (DER) process is being streamlined and the threshold for problem identification has and will continue to be lowered. The quality of significant event investigations has been improved. A goal of closing DERs within 120 days has been established to ensure timely corrective action implementation. Training initiatives and feedback describing areas where performance could have been improved has already resulted in more conservative decision making by the plant staff. The case study format has proven to be a valuable tool for implementing this type of training.

While still early, the efforts described above have shown signs of being effective and have resulted in improved performance in procedural compliance, problem resolution and conservative decision making. The recent plant shutdown due to an Emergency Equipment Cooling Water design problem and actions taken based on high diesel generator fuel oil particulates have demonstrated this improvement. The challenge, as always, is to sustain that improvement while we continue to monitor and adjust our programs as necessary.

We are pleased with the continuing good performance in Maintenance activities. Improvements in the work control process are under way to strengthen the commitment to the execution of routine maintenance activities. These improvements include formation of a dedicated team to assist the plant with daily emergent work. This will minimize disruptions for the majority of the work force and will concentrate more emphasis on both the daily and emergent work activities. This focused, managed approach will provide for more positive control of the work process and more consistent long term planning. Our renewed commitment to the 13 week schedule will strengthen the execution of our 4 week schedule and continue to improve the materiel condition of the plant.

Our current plant design presented Engineering with numerous and unique challenges which are reflected in the SALP Report. Although some aspects of Engineering improved, we recognize that additional emphasis is needed. Detroit Edison acknowledges the challenge to implement a program for effective problem identification and timely corrective actions. We recognize corrective actions in the past were sometimes narrowly focused and often failed to address the root

cause. An assessment of the engineering process was performed. As a result, management changes were made and the station staff augmented with additional engineers and contractors. Resources were dedicated to eliminate the engineering backlog and improve support of real time in process activities such as the 13 week schedule. The creation of Component Engineers to assist the System Engineers will shift focus of the System Engineer from day-to-day problems to a longer term vision such that work control can be improved. A comprehensive evaluation of the Turbine Building Heating, Ventilation, and Air Conditioning (TBHVAC) system has been completed. As a result, some changes are being implemented and major modifications are presently planned for the sixth refueling outage (RF06). A Comprehensive Integrated Technical Assessment (CITA) of Engineering was performed by Nuclear Quality Assurance which identified performance and process weaknesses which will be addressed. In taking a proactive step, the schedule for the Service Water System Self Assessment was advanced and subsequently identified problems which were resolved satisfactorily. These changes will result in more consistent identification of issues and will improve communication, coordination, and focus.

We are extremely pleased with the excellent performance in the areas covered under Plant Support, Radiation Protection, Chemistry, Security, Emergency Response, and Fire Protection. This is especially important to us because the programs mentioned rely on support from all groups within the plant. Excellent performance requires teamwork and communication across all organizations. In the emergency planning area we would also like to acknowledge the excellent relationship and support of our local officials, which contributed to this excellent program. Self-assessment and corrective actions were effective in maintaining this excellent performance; attributes which we are actively promoting across all of the other functional groups.

We would also like to recognize the role of Nuclear Quality Assurance and the Independent Safety Engineering Group (ISEG) in identifying problems. These groups are exploring methods for taking a more pro-active role on site. Nuclear Quality Assurance recently completed the CITA of Engineering where the scope of the assessment was modeled after the NRC's Integrated Performance Assessment Process (IPAP). The continuing critical assessments of plant activities by these groups is crucial to our efforts to improve performance in the Operations area and to ensure sustained improvement in all areas. The challenge remains to be more intrusive, more proactive, more conservative in decision making, and to be more effective in problem follow-up. Significant improvements have been implemented or are ongoing to bolster support of the Operations functional area as indicated above.

We are not satisfied with the adequate rating, and by implementing the changes, we intend to apply the same consistent focus to routine evolutions as well as to high visibility work activities, in order to significantly improve performance.

Sincerely,

cc: M. J. Jordan
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Region III