

NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2

Docket No. 050-341
License No. NPF-43

During an NRC inspection conducted on February 1 through March 19, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

1. Technical Specification 6.8.1 requires that procedures shall be established, implemented, and maintained covering applicable activities listed in Appendix A of Regulatory Guide 1.33, Revision 2.

Regulatory Guide 1.33, Revision 2, Appendix A, Section 4.w states that instructions for energizing, startup, shutdown, and changing modes of operation should be prepared for Offsite Electrical Systems (access circuits).

Contrary to the above, on February 3, 1997, the inspectors identified that the licensee did not have prepared instructions for energizing and startup of Bus 302 in the Offsite Electrical System.

This is a Severity Level IV Violation (Supplement I).

During an inspection conducted August 21 through 30, 1996, and September 9 through 11, 1996, violations of NRC requirements were identified. In accordance with the NRC "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

2. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, as of September 11, 1996, the inspectors identified the following examples of inappropriate quantitative acceptance criteria:

- a. An inappropriate quantitative acceptance criteria of 0.033 standard cubic feet per minute (scfm) air leakage for the accumulators on the automatic depressurization system (ADS) was used in Surveillance Procedure 43.137.002, Revision 21, "SRV Accumulator Check Valve Test." The designed calculated acceptance leakage rate was 0.002 scfm. Thus the accumulators could have been depressurized such that they would not have allowed for 5 actuations of the ADS in 36 hours in accordance with the original design.
- b. An inappropriate quantitative acceptance criteria of 25 standard cubic feet per minute (scfm) air leakage rate for air operated valve P50-F440, and

20 scfm air leak rate for air operated valve P50-F441 were used in Surveillance Procedure 24.129.04, Revision 26, "Control Air Isolation Integrity." This leakage rate would have made the non-interruptible Control Air System inoperable due to not being able to provide sufficient air supply during accident conditions.

- c. An inappropriate quantitative acceptance criteria for open coil contactor pickup voltage (104v) was used in Maintenance Procedure 35.30C.008, "Motor Control Load Compartment," for High Pressure Core Injection Valve E4150-F059. The correct calculated available voltage was 102.9v. Thus the available voltage could have been such that the valve would not have opened under accident conditions.

This is a Severity Level IV violation (Supplement I)

3. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Quality Assurance Manual, MQA02, Revision 3, Section 4.8, "Internal Audits and Surveillances," requires that Deviation Event Reports (DER) be issued for findings identified in quality assurance audits and surveillances.

Quality Assurance Manual MQA02, Revision 3, Section 3.6.5, requires that repetitive problems identified through the audits/surveillance be escalated to management attention through the Management Action Request (MAR) process.

Contrary to the above, as of September 11, 1996, the inspector identified the following examples of failure to accomplish an activity in accordance with instructions:

- a. A Quality Assurance (QA) inspector failed to issue a DER for three findings identified in Audit NQA 96-0106 in accordance with MQA02, Section 4.8.
- b. A QA inspector failed to escalate to management a repetitive problem with inappropriate transfer of corrective actions from old DERs to new DERs in accordance with MQA02 Section 3.6.5. The problem was originally identified in Audit NQA 95-0133 and was again noted in Audit NQA 96-0106.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, the Detroit Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at
this 2nd day of June 1997