

B. Ralph Sylvia
Group Vice President

Detroit
Edison

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

April 2, 1988
NRC-88-0042

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Reference: (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

(2) Notice of Violation (NRC Inspection Report No.
50-341/88003) dated March 3, 1988

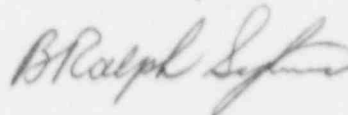
Subject: Response to a Notice of Violation

Attached is Detroit Edison's response to reference 2 entitled "Response to a Notice of Violation". This Technical Specification violation was for an event reported in Licensee Event Report 88-005.

The violation of Technical Specification occurred because of a misunderstanding of the requirements by a Nuclear Shift Supervisor. Detroit Edison took disciplinary action in accordance with company policy. In order to prevent recurrence, required reading was issued to operation personnel and discussions were held with the Nuclear Shift Supervisors about this event.

For further information, contact Patricia Anthony at (313) 586-1617.

Sincerely,



cc: A. B. Davis
R. C. Knop
T. R. Quay
W. G. Rogers
Region III

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Description of the Violation

On January 11, 1988 during a reactor startup, reactor pressure exceeded 150 psig without the High Pressure Coolant Injection System and the Reactor Core Isolation Cooling System being placed in the standby lineup. This is contrary to the requirements of Technical Specifications 3.5.1, 3.7.4 and 3.0.4. The Nuclear Shift Supervisor on duty did not recognize this violation since he felt he had twelve hours to place both systems in the standby lineup. He believed that the footnotes to Technical Specifications 4.5.1.b.3 and 4.7.4.b which state, "The provisions of specification 4.0.4 are not applicable provided the surveillance is performed within twelve hours after reactor steam pressure is adequate to perform this test." were applicable to placing the systems in the standby lineup.

Corrective Actions Taken and Results Achieved

The High Pressure Coolant Injection System was placed in standby mode 19 minutes after the reactor pressure exceeded 150 psig. The standby mode for the Reactor Core Isolation Cooling System was achieved 27 minutes after reactor pressure exceeded 150 psig.

Corrective Actions Taken to Avoid Further Violations

Urgent required reading was issued to the operations shifts to make them aware of this event and its consequences. Additionally, the operations management met with the Nuclear Shift Supervisors to clarify the requirements for High Pressure Coolant Injection and Reactor Core Isolation Cooling Systems operability at or above 150 psig reactor pressure.

Date When Full Compliance Will Be Achieved

Fermi 2 is now in full compliance with the requirements of the applicable Technical Specification. The corrective actions implemented because of this event were completed on January 21, 1988.