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March 31, 1988  
NRC-88-0076

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

- References:
- 1) Fermi 2  
NRC License No. 50-341  
NRC Docket No. NPF-43
  - 2) NRC Region III Letter to Detroit Edison, SALP 8 Board Report, August 3, 1987
  - 3) Detroit Edison Letter to NRC "Response to SALP 8 Board Report", NRC-87-0169, September 24, 1987.
  - 4) NRC Letter to Detroit Edison dated February 1, 1988

Subject: Updated Response to SALP 8 Board Report

In a February 2, 1988 letter (Reference 4), NRC requested Detroit Edison to provide an updated response to the NRC SALP 8 Board Report (Reference 2). Attached is the requested update.

In September 1987, Detroit Edison submitted its response (Reference 3) to the SALP 8 Board Report and described a number of completed and planned actions directed at improving our performance in a number of functional areas. Most of the actions identified in the September 1987 response have been completed as discussed in the attached update. The corrective actions described in the surveillance functional area are the one notable exception. These corrective actions are now under the auspices of the Technical Specification Improvement program.

As discussed in this updated report, because Detroit Edison is addressing and correcting deficiencies as they are identified, the duration to complete the overall program has been extended. The date for completing the Technical Specification Improvement program is now December 31, 1988. Additional detail on the status and schedule for the program was provided at the last routine monthly meeting which occurred on March 29, 1988. Additionally, Detroit Edison is submitting an update of the Technical Specification Program.

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On a related topic, Detroit Edison has performed a self assessment patterned after the NRC's SALP process. The "Self-SALP" was performed during February and March 1988, and covered the period between April 1, 1987 and February 29, 1988. This period coincides with the period NRC will assess for SALP 9 with the exception of March 1988.

We are prepared to discuss the contents of this updated SALP 8 Board Report response with you at your convenience.

Sincerely,

*B. Ralph Sylvia*

Enclosure

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

UPDATED SALP 8 RESPONSE

A. PLANT OPERATIONS

A new plant manager has been on the plant site since October 1, 1987. The plant manager has improved the response to plant operating and regulatory problems by ensuring that they are resolved in a more timely manner. Two key areas where the plant manager has initiated improvements have included implementation of an Operating Evolution Evaluation Program, which has been discussed with you in more detail at other times, and implementation of an improved Deviation Event Reporting system used to identify, track and correct a wide variety of plant problems.

A significant effort has been placed in improving plant performance in the area of Technical Specification compliance. Greater emphasis has been placed on Technical Specification interpretation and system interactions by covering Technical Specification Case Histories during licensed operator continuing training. Forty Technical Specification Case Histories have been drafted and transmitted to Nuclear Training for use in operator training programs. Operations lessons learned are also used in operator continuing training. As an example, surveillance scheduling problems were reviewed with licensed operators and their feedback resulted in modifications that improved the tracking and scheduling system. Also, surveillance data with errors was given to licensed operators during requalification training to acquaint them with the types of errors they may see and to improve their data review techniques.

The Operations procedures group has made significant strides in the past few months in improving both the timeliness of implementing procedure changes requested by shift personnel and in the quality of the changes that are being processed.

A number of Operations Practice Standards have also been implemented over the last few months. These Operation Practice Standards provide additional guidance to operating personnel on the framework within which they are expected to perform their jobs. These Operations Practice Standards, in particular, provide guidance to shift supervision and operators on how they are expected to conduct operations. The Evolution Evaluation Program has been utilized to monitor performance against these Operations Practice Standards.

A simulator evaluation program has been implemented to evaluate shift team performance over the full-range of operation, including Emergency operating and abnormal operating procedures and Radiological Emergency Plan implementation. Senior management, in conjunction with Operations management, evaluates shift team performance against the Operations Practice Standards. The evaluation program has the benefit of reinforcing managements view of the standards, assessing operator training needs and evaluating instructional skills.

#### B. RADIOLOGICAL CONTROLS

Plant management involvement has continued in this area in efforts to maintain good water chemistry. During power ascension in support of startup testing, sulphate ingress from the moisture separator reheaters through the forward pumped drains continued to be a problem. While total elimination of the sulphates was not possible, management has taken steps to ensure that the levels were maintained as low as possible. Some of these steps included reducing reactor power levels, increased resin replacement of the RWCU demineralizers, use of only one forward pumped drain, and the addition of new septums on the polishing demineralizers that are less susceptible to resin breakthrough. Also, an on-line ion chromatograph was installed to closely monitor and trend the source of sulfate ingress. An expert assisted Detroit Edison in the use of the equipment to optimize its performance. Data generated has been extremely useful in diagnosing water chemistry problems.

In addition to concern for maintaining good water chemistry, Fermi management continues to emphasize personnel radiological awareness. An article, "To Your Health" appears each month in the plant newspaper that addresses radiological concerns that plant workers may have. As an example, an article in the March issue discussed hot particles and the precautions needed to be taken to prevent their generation. The same issue also discussed the increased Health Physics Technician coverage during the LLRT outage. The article encouraged anyone having questions or problems on radiological protection to contact Health Physics.

Total occupational exposure continued to be low during 1987 and was about 20 person-rem. There were no unplanned radiological releases in 1987, or thus far in 1988.

Efforts have been made and have been successful in reducing the amount of unnecessary material, which becomes trash, that enters the radiological controlled areas. This is one reason why the

amount of low-level radioactive waste generated in 1987 was significantly lower than the industry average.

During a recent INPO evaluation, Detroit Edison received 5 INPO Good Practices in the area of radiological controls. Three were a result of an INPO plant evaluation and two from an INPO corporate evaluation.

C. MAINTENANCE

Significant management attention has been directed at reducing the PM and CM backlogs as well as reducing the number of CRIS dots and problem annunciators. The Priority "A" PM backlog has been reduced from a high of over 750 in August 1987 to 160 at the beginning of March 1988. The remaining Priority "A" PM backlog will be eliminated during the current LLRT outage. Although the CM backlog has not been reduced, a large number of CMs have been completed over the last six months and the total number have been maintained at a reasonable level. However, management attention continues to be directed at reducing the number of CMs. Additionally, management attention has continued in the effort to maintain the number of CRIS dots and illuminated annunciators as low as possible.

Work processes previously identified as cumbersome have been modified. While further improvements are anticipated, the following improvements have contributed to increased efficiency. Work packages are now separated into two classifications: major and minor. Major packages are prepared by Maintenance Support Technicians, while minor packages are prepared by the Maintenance Foreman and thus placed in the field much quicker. A work package closure group has been located in the vicinity of the Research Tagging Center which facilitates reviews required for package closure.

An initial walkdown and replacement of deficiency notice tags (DNTs) has been completed. During this initial phase, tags under the new system were placed on open jobs. The next phase of the DNT conversion process is in progress and involves removing the remaining old style tags in the plant that are no longer needed.

Equipment History Files, encompassing all equipment history not just NPRDS, are being stored in a computer database to facilitate data retrieval. The database is formatted for access via Institute of Nuclear Power Operations (INPO) code systems. After a work package is completed the Equipment History is entered into the computer data file for permanent storage.

The I&C surveillance procedure improvement effort was recently completed. Over 440 I&C procedures that implement technical specification surveillance requirements were involved in the improvement effort. Areas addressed included adding impact statements, eliminating the use of jumpers and lifted leads where applicable, amplifying on caution statements for high risk steps, and other human factor improvements to make the procedures easier to understand and perform.

D. SURVEILLANCE

As stated in our response to the SALP 8 Board Report (Reference 3), Detroit Edison is correcting the programmatic deficiencies in the Surveillance program by performing a detailed technical review of the Technical Specification surveillance requirements and the corresponding surveillance procedures. We had indicated in our original SALP 8 response that the review effort would be completed by March 31, 1988. As we stated in our November 23, 1987 letter, this surveillance program review effort has been included as part of the Technical Specification Improvement Program and that this review of all surveillance procedures was targeted for completion by June 30, 1988. As work has progressed on the Improvement Program, we find that it would be more appropriate to correct the problems as they are found rather than just find the problems. Otherwise, we are not able to make our final reviews to verify that appropriate corrective actions have been taken and that our technical adequacy goals have been met. Thus, Detroit Edison is planning to extend this procedure review and corrective action effort until December 31, 1988, which will coincide with the commitment to complete the enhanced procedure effort by December 31, 1988. In some cases, the Technical Specification changes that have been submitted also require procedure changes that need to be incorporated in this total Technical Specification and procedure improvement effort.

The I&C surveillance procedure improvement effort described in Detroit Edison's response to a civil penalty, (NRC-87-0081 dated June 13, 1987) has been completed. Although we have had minimum experience with the use of these improved procedures, the setpoint calculation and verification effort completed by the Nuclear Engineering organization should definitely provide us better confidence in the technical adequacy of these procedures.

Although the SALP 8 Board Report stated that the staffing to support the surveillance effort generally appeared adequate, monitoring In-Service Test (IST) pump and valve performance appeared weak. The reorganization and reallocation of duty

responsibilities within the Technical Section regarding surveillance scheduling, IST, and In-Service Inspection (ISI) have been completed. We will continue to evaluate our performance in this area to determine if any further changes are needed.

It was stated in the SALP 8 Board Report that our approach to resolution of technical issues regarding the surveillance program needed improvement. It was also stated that short term corrective actions were normally adequate and timely; however, long term corrective actions were occasionally slow in development, slow in implementation and not thorough enough. The formation of the Surveillance Upgrade Program and the Technical Specification Improvement Program with considerable manpower devoted entirely to those efforts indicate management's willingness and desire to improve in these long term corrective actions.

The SALP 8 Board Report identified a concern which dealt with the testing of the main steam isolation valve leakage control system (MSIVLCS). As documented in Inspection Report 87046 (DRP) dated February 5, 1988, the analysis referenced in the SALP 8 Board Report has been forwarded to NRR for their review and is being carried as Unresolved Item 341/87009-02 (DRP).

E. FIRE PROTECTION

Not reviewed in SALP 8.

F. EMERGENCY PREPAREDNESS

Detroit Edison has received a Category 1 rating in the area of Emergency Preparedness over the last two SALP report periods. Such performance was again demonstrated during the routine safety inspection conducted by the NRC during the period January 11-15, 1988. At the conclusion of the inspection, the NRC stated that no violations or deviations from requirements were identified.

During this inspection, the NRC was also able to close six previously identified NRC findings based on corrective actions Detroit Edison had taken. Six remaining items cannot be closed until the items can be satisfactorily demonstrated under drill conditions.

As a result of NRC concerns identified during FERMEX-87, Detroit Edison proposed a number of enhancements to be incorporated into the emergency response program. These enhancements were communicated to the NRC Region III at a meeting requested by

Detroit Edison. Periodic updates are being communicated to NRC Region III on the status of their implementation.

Detroit Edison continues to maintain an excellent working relationship with State and local organizations. This cooperation also extends to the Canadian officials who are responsible for the implementation of emergency planning requirements in the 224 acres of Essex County that lies in the 10 mile Emergency Planning zone.

Detroit Edison has continued to seek improvements that will enhance the program and the performance of individuals who comprise the Emergency Response Organization. Individuals in the ERO have participated in INPO related and NRC sponsored seminars, audits and drills.

#### G. SECURITY

The NRC SALP 8 report dated August 3, 1987 commented on several aspects of the Detroit Edison Security program. First, it reported that the enforcement history of the Nuclear Security Program during the SALP 8 period was marginal when compared to similar facilities in Region III. The report recognized improved management involvement and the establishment of a comprehensive Performance Indicator Program. It indicated a need to improve communications with the site Resident Inspector. The report suggested that future allegation investigations be more timely. Finally, the report concluded with a caution that continuation of the "improving trends" was contingent upon the development of effective management review programs to identify and correct potential problems before they become significant.

The following is an update of progress achieved by the Nuclear Security organization during the period January 1, 1987 to February 28, 1988. During this period significant improvements have been made within the Nuclear Security organization. The improvements cover a wide range of topical areas, and include organizational structure, the development of meaningful training programs for all staff personnel, the development of control mechanisms, a Performance Indicator Program, changes in the Physical Security Plan, timely allegation investigation support, an increased number of program reviews, and an overall reduction in NRC open items.

Throughout 1987, Nuclear Security worked to formalize and stabilize the organizational structure, mission and objectives. Permanent positions were established for each of the five principal department sections. In addition, the position of



Nuclear Security Specialist was expanded to include support for each section. Within the Operations section permanent positions of Security Shift Supervisor and Assistant Security Shift Supervisor were approved, and selections made. The Company's selection processes were used to properly fill all positions, and at the present time all positions are permanent and recognized by the Company and staffed. The staff turnover rate for 1987 was 2.3%.

During the latter part of 1987 the Superintendent, Nuclear Production Services was transferred to another part of the nuclear organization, and the Director, Nuclear Security reported directly to the Vice President, Nuclear Operations. This was a temporary move until the new Plant Manager was able to orientate himself. The Director, Nuclear Security now reports to the Plant Manager.

Significant adjustments have been made within Nuclear Security to enhance its training program. Emphasis throughout the period has been in the creation of a performance-based training program. Numerous aids, such as walk-through metal detectors, and testing spheres, have been integrated into the "hands on" performance based training program. The most recent example of such training involved warehouse operations, where instructions on package sealing, the application of proper search techniques, and Security personnel responsibilities were practiced in the warehouse. Security Officers conducting the day-to-day transfer of material helped a training instructor develop the lesson plan. The "hands-on" practice by all training classes has not only contributed to a better understanding of the material transfer process, but demonstrated the department's ability to tap into one of its most valuable resources, its Security Officers' knowledge.

Emphasis continues on the Supervisory Development Program within the Nuclear Security organization. One Security Shift Supervisor has been assigned to a one year training program to help achieve a better understanding of the varied aspects of the Nuclear Security Program. In addition, Supervisors and Assistants have participated in a Process Management Skills course (problem solving).

Throughout 1987 and thus far in 1988 significant resource efforts have been targeting on the development of the Nuclear Security Performance Indicator Program. The program, when complete will provide timely data (routinely and upon demand), to management, to facilitate a review of trends (positive or negative), so that corrective actions (if needed), can be instituted. At the present time the computer-based programs have been designed to track data

pertinent to each of the five major Security sections. The program is approximately 75% complete. All identified screens have been developed. Data input has begun and work on automated report generation is progressing on schedule. Items not currently available in the computer-based files are being maintained through manual means.

Through February 28, 1988, two plan changes were submitted in accordance with the provisions of 10CFR50.54(p). Each of the changes was discussed thoroughly with both the USNRC Region and Headquarter's personnel. The Physical Security Plan changes in each instance increased the effectiveness of the Security Program. Additionally, periodic meetings are held with the NRC Resident Inspectors to ensure that items of interest regarding security at Fermi 2 receive the appropriate level of attention.

Through February 25, 1988, the Nuclear Security organization investigated two allegations forwarded by NRC Region III. One allegation involved allegations targeted against the Company's fitness for Duty Program, and another requested a review of an ALARA concern. Both were compiled and submitted on a timely basis. Any allegation will continue to receive top priority.

During the period, January 1, 1987 through February 28, 1988, Detroit Edison Nuclear Security made eight Security Event Reports to the NRC. The reports included the detection of contraband material prior to entry into the protected area, a self identified deficient barrier, four instances in which the security computer caused the implementation of compensatory measures, and two licensee identified access control problems.

During the period October 12, to October 23, 1987, the Detroit Edison Nuclear Quality Assurance (NQA) section reviewed the Nuclear Security Program. All findings were resolved and the program was determined to be effective. An audit of the personnel access authorization process is planned, and definition of the audit scope is currently underway. In addition, NQA performed nine surveillances of the Security Program. In June, 1987, the Security program was reviewed by the Regulatory Effectiveness Review team from NRC headquarters. Ten open items were generated as a result. When an NRC Region III Security Inspection team exited on February 5, 1988 only two open items remained.

Security management has continued to place emphasis on self-auditing of all program aspects. During the period January 1, 1987 through February 28, 1988, seventy-two Security Compliance Evaluations and inspections were conducted.

Twenty-four Security Program shortcomings were detected and corrected. Each shortcoming is reviewed by a Security management team to determine root cause and appropriate long term corrective action. All corrective actions are monitored closely by the Director, Nuclear Security.

We believe that all aspects of the Security Program are sound, attentive to detail, and well managed.

#### H. OUTAGES/REFUELING

Our outage experience, coupled with improved planning tools and organization stability, has improved our performance in this area. Detroit Edison's commitment to incorporate "Lessons Learned" and increase the use of the licensed operator in routine planning functions are two methods used to improve the effectiveness of outage management. To support and supplement our staff for the Local Leak Rate Testing outage that is underway, an experienced Bechtel outage team was hired. This action was taken to ensure the success of the present outage and to modify our programs for future use. Detroit Edison is continuing to take whatever steps are necessary to optimize its effectiveness in outage management.

#### I. QUALITY PROGRAMS

Several actions have been taken since the original SALP 8 response was made to assure continuing compliance with design procedures.

Discipline Engineers and Supervisors in the Nuclear Engineering organization were given safety evaluation training last October and have since received additional guidelines emphasizing the important aspects of safety evaluation preparation and the quality of that review. An outside consultant has noted improvement in the overall process since the training occurred.

In December 1987, the General Director of Nuclear Engineering gave training on the overall duties, functions and responsibilities assigned to the Nuclear Engineering Staff. Both Nuclear Engineering and Stone and Webster personnel were in attendance. A Functions and Responsibilities list was also assembled and issued to the entire Nuclear Engineering department.

The Vice President, Nuclear Operations and Plant Manager gave members of the Nuclear Engineering organization Deviation Event Reporting (DER) training in January of this year. Both Plant and Engineering personnel attended a training session on Communication

and Interface which covered issues raised in a recent INPO Corporate Audit including compliance with design control procedural matters.

Several letters have been issued to Engineering personnel which addressed compliance with procedures and have emphasized accountability:

- Procedure Compliance Awareness and Non-compliance consequences issued September 21, 1987.
- Compliance with FSAR commitments issued September 15, 1987.
- Correct use of Design Change Documents issued September 16, 1987.
- Safety Evaluations issued November 9, 1987.

Nuclear Engineering Supervision has been assigned a specific Business Plan action dealing with progressive discipline and enforcement of accountability for failure to follow procedures or training.

The Nuclear Engineering Plant Support Interface function was upgraded to support Operations during second shift. Nuclear Production has stated that Operations and Maintenance issues assigned to Engineering are being addressed in a more timely manner since the original Plant Support Engineering function was established. INPO also noted this as a "Good Practice".

One method being used to identify concerns and suggest possible solutions in warehousing operations is the Material Process Review Task Force. Participants on this task force include QA, Procurement, Maintenance, Nuclear Engineering and Warehouse personnel. The task force efforts have been directed at ensuring the efficient and expedient procurement of material and the elimination of redundancies in the procurement process. Items being addressed by the task force include:

- o Physically consolidating the Material Engineering Group (MEG), Procurement Quality Assurance (PQA), and Procurement.
- o Enhancing the Requisition Status System (RSS) to improve access to information regarding material availability and planning information.
- o Revising Nuclear Operations procedures related to material control and procurement to simplify routine processes.

Management also conducted an internal assessment of warehouse operations. Improvements implemented as a result of this management assessment include changes to the processing of incoming Material Returned To Warehouse (MRTW) as it is received to assist in reducing backlogs, the creation of a separate staging point for material needed to support Engineering Design Change Packages and the transfer of stock to warehouses based on the frequency of their usage to provide more efficient support to plant personnel.

The Emergency Spare Quantity (ESQ) program has undergone review to ensure checks are in place to maintain required stock levels. The yearly expiration report on the Shelf Life Program is complete in addition to the elimination of backlogged requests for engineering evaluations. All outstanding expired items for stock have been ordered. Finally, tasks associated with the warehouse office areas have been re-evaluated for the reassignment of duties and elimination of redundant tasks.

Nuclear Quality Assurance (NQA) has refocused its efforts in the design control area to be more technically oriented and is presently conducting a "cradle to grave" surveillance of an electrical circuit and all associated equipment, controls, etc. The surveillance will focus on the technical adequacy of design changes. This surveillance is being conducted by two Electrical Engineers with design experience.

NQA is also conducting a surveillance of a vendor's engineering effort for the March 1988 LLRT outage as requested by the General Director, Nuclear Engineering. Again, the technical adequacy of the engineering effort will be the primary focus in this surveillance.

NQA currently has three personnel assigned to Engineering QA, all of whom are degreed engineers, two electrical and one civil with design experience. Additionally, NQA is actively recruiting technical expertise for other areas.

A new corrective action procedure has been implemented that has reduced the threshold at which problems are identified on a Deviation Event Report (DER). Management has aggressively supported this policy and the results are evident by the increased numbers of DEIs that have been written and the high number of evaluations and corrective action responses that are completed on time. Root cause evaluations and proposed corrective actions are now the responsibility of the responsible section head to evaluate and complete. Plant Safety reviews and evaluates each of the

responses for adequacy. The recent changes to the DER process have not been in place long enough for the NQA audit performed in January 1988 to measure the effectiveness of these changes. The corrective action process is scheduled to be audited again in July 1988.

Currently, the Director, Plant Safety is an SRO licensed individual and reports to the Director of Nuclear Quality Assurance. A new QA Director with operating experience has been hired. Having the Plant Safety group reporting to the Director QA, consolidates the quality programs and corrective action processes.

#### J. LICENSING

In January 1988, the Supervisor, Licensing position was filled. Previously, the Director, Regulatory Affairs was also the Acting Supervisor, Licensing; both of which are full time positions. Detroit Edison expects that having the Licensing Supervisor position filled on a full-time basis will result in improved performance in the Licensing functional area.

Detroit Edison believes it has continued the positive trend that was exhibited by us mid-way through the SALP 8 assessment period and as was noted in the SALP 8 report. Engineering continues to be more aggressive in resolving technical issues such as the 72CF swingbus design and Instrument Loop Accuracy. Detroit Edison has responded to the NRC Technical Evaluation Reports (TER) on the Detailed Control Room Design Review and SPDS. The corrective actions described in the responses to both of these issues address the concerns raised in the TER and are evidence of management's attention to the issues.

Management attention and involvement have been evident in the resolution of equipment problems and other technical issues. Some of the more significant examples are the control room evolution evaluations, technical specification improvement efforts, water chemistry monitoring, and feedwater pump suction pressure rating.

As evidenced by the relatively few requests for additional written information, the Technical Specification changes submitted continue to be thorough and reflective of our attention to detail and understanding of plant system operation.

K. TRAINING AND QUALIFICATION

The training effort has centered on improving the technical knowledge and skills of plant work groups. This effort is ongoing and consists of implementation of the Institute of Nuclear Power Operations (INPO) accredited training programs. Specifically, the accredited training programs for mechanical and electrical maintenance journeymen, instrument repairmen, chemistry technicians and health physics technicians have been started. The accredited programs are based on a systems approach to training. Completion of accredited training should significantly improve personnel knowledge and skills and ultimately result in improved performance.

In addition to improving the technical knowledge and skills of plant work groups, significant progress has been made in improving the technical knowledge of the instructors who teach licensed operators. All licensed operator instructors have completed Senior Reactor Operator (SRO) certification. One year cross-training assignments of a licensed operator and a training instructor continue with implementation of a second assignment in 1988. Licensed operator instructors continue to be assigned as an extra man on shift in order to increase their operations experience. Some licensed operator instructors participated in the control room audit program assisting senior management in their review of shift operations. Finally, licensed operator instructors have been given feedback on the results of the control room evaluation program.

The Director Nuclear Training has been maintaining close communication with the Operations Superintendent as well as other unit heads. Several meetings have been held with Operations, Maintenance, Health Physics, Chemistry, and Technical Support to review the accredited training programs and the training performance of their personnel. These meetings have resulted in improved communication and feedback. In addition, feedback from the PRIDE process has been used to revise non-licensed operator training to make it more job related. Feedback based on operating experience of the recirculation control system resulted in remodeling of the simulator software and retraining of the operators. Feedback based on industry experience resulted in development and implementation of motor operator valve training for licensed and non-licensed operators. These examples indicate that training feedback has resulted in improved technical training.

Great emphasis has been placed on Technical Specification interpretation and system interactions. This has been accomplished by covering technical specification case histories and operations lessons learned during licensed operator continuing training. Actual surveillance scheduling problems were reviewed with licensed operators, and their feedback resulted in modifications that improved the tracking and scheduling system. Surveillance data with errors was given to licensed operators during requalification training to demonstrate typical errors and to improve their data review techniques. Training that emphasized the licensing basis of Technical Specifications was presented to operators during requalification training that began in March 1983.

Training has played, and will continue to play, a significant role in improving personnel performance. The major improvements have concentrated on implementation of accredited training programs for applicable work groups; improving the technical knowledge and operating experience of instructors; improving the use of feedback mechanisms and development of surveillance procedure training.

#### L. STARTUP TESTING

Startup Testing has continued to progress in a highly satisfactory manner. During the latter part of 1987, testing was completed in Test Condition 3 and Test Condition 5. Some testing in Test Condition 6 has been completed at this time. Currently testing in Test Condition 4 and Test Condition 6 remains to be completed.

The emphasis in the Startup Organization continues to be a thorough and methodical effort toward identifying and resolving plant problems. It is a Detroit Edison objective to continue to perform in an exemplary manner in this area.