

NOTICE OF VIOLATION

Detroit Edison Company
Fermi 2

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

During an NRC inspection conducted on March 20 through May 9, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, Section 9.a requires, in part, that maintenance that can affect the performance of safety related equipment should be properly preplanned in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," required, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

As implemented by licensee's procedures:

- a. MMA07, "Post Maintenance Testing (PMT) Guidelines," Revision 2, Section 3.2 states, in part, "The scope of the PMT shall be based on the maintenance activity performed. A satisfactory PMT is one that: (1) Demonstrates correction of the original deficiency under normal operating conditions and/or plant conditions at the time of the failure, (2) Ensures no new or related deficiencies have been created, and (3) Ensures the system or component can perform its intended function.
- b. MOP02, "Independent Verifications," Step 3.2.1.3 required that equipment important to safety shall have independent verification performed to ensure that equipment, valves, and switches that were placed in an abnormal position are correctly aligned.

Contrary to the above:

- a. On April 10, 1997, the inspectors identified that Work Request 000Z974252 specified selected steps from Procedure 44.060.001 as post

maintenance testing for corrective maintenance on valve E5150-F007 that were inadequate to the circumstances. Specifically, the steps failed to ensure the Reactor Core Isolation Cooling System would perform its intended function in accordance with MMA07.

- b. The licensee identified that on April 3, 1997, the procedure for preventive maintenance event AF11970403, "Obtain Sample of EDG-11 Starting Air Compressor Crankcase Oil" was inadequate to the circumstances. Specifically, the procedure failed to have an independent verification to ensure that the compressor was correctly aligned after oil replacement in accordance with MOPO2.
- c. The inspectors identified in March 1997 that Work Request 000Z964874 and Maintenance Procedure 35.310.02, "24/48 VDC Electrical System - General Maintenance," were inadequate to ensure new battery cells were installed in a condition to support the safety related components of the 24/48V DC Electrical System. Specifically, these procedures did not contain any instructions to perform pre-installation checks to ensure the new cells were ready to perform their intended function, such as checking adequate electrolyte level, specific gravity, and state of charge.

This is a Severity Level IV Violation (Supplement 1).

- 2. Technical Specification 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, Section 9.a requires, in part, that maintenance that can affect the performance of safety related equipment should be properly preplanned in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," required, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

Radiation Work Permit 971011 required, in part, that workers are to notify Radiation Protection personnel to obtain a briefing of radiological conditions before going above 8 feet above the floor inside the Radiologically Restricted Area.

Contrary to the above, inspectors identified that on May 4, 1997, workers failed to adhere to the work instructions and did not notify Radiation Protection personnel before using a portable lift to gain access to a valve in excess of 8 feet above the floor inside the reactor building, in an area within the Radiologically Restricted Area. As a result, the workers did not receive a briefing of radiological conditions.

This is a Severity Level IV Violation (Supplement 1).

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 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 Lisle, Illinois,
this 1st day of July 1997