

B. Ralph Sylvia  
Senior Vice President

Detroit  
Edison

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

August 25, 1988  
NRC-88-0167

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

- References: (1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
- (2) Notice of Violation from NRC Inspection Report  
No. 50-341/88006 dated May 17, 1988
- (3) Detroit Edison letter NRC-88-0153 dated June  
29, 1988

Subject: Revision to Response to Notice of Violation  
88006-03

In reference 3, Detroit Edison committed to completing an accelerated validation of the Spare Parts Reference System (SPRS) data base for safety related and Quality Assurance class IM parts by October 31, 1988. Upon further review, Detroit Edison has established a better approach to correct the finding. Therefore, Detroit Edison is revising its commitment to the following:

Corrective Action to Avoid Further Violations:

A plan has been established to validate the SPRS data base for all safety related and class IM replacement parts prior to placing them in service. SPRS validation need not be completed when SPRS is not used as the basis for part selection.

A technical review will be performed to verify that the proposed application of the parts are appropriate. The SPRS data base will subsequently be updated with validated information to designate the parts application as approved and coded as validated. The technical review will be completed prior to declaring replacement components operable for safety related and QA IM applications for parts which have not been previously validated.

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Our Materials Engineering Group has an ongoing SPRS validation program in place. Approximately 1500 stock items have previously been validated. These items are noted in SPRS as having received a two star review (i.e., validation complete) and so have been designated as approved parts applications. Procedure 12.000.29 was revised to require that the Materials Engineering Group review the requisition on stores for safety related or class IM application which have not been validated.

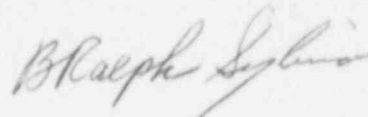
In summary, until the SPRS validation plan is completely implemented, all safety related and class IM replacement parts will continue to be verified against an approved document other than SPRS prior to declaring the affected component operable, until that part application has been validated.

Date When Full Compliance Will Be Achieved:

Regulatory compliance has been achieved by implementing the verification of safety related and class IM replacement parts against another approved document. Since the validation process will be performed at the time parts are requisitioned for use, the validation program will be an ongoing long term activity. Detroit Edison considers this to be a more systematic approach to the completion of this commitment. In addition, the experience gained via the maintenance suitability reviews will remain on site since the validations are performed by Detroit Edison personnel.

If you have any question, contact Patricia Anthony at (313) 586-1617.

Sincerely,



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