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January 29, 1986
VP-86-0013

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

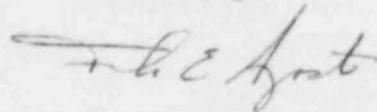
Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Detroit Edison Response
Inspection Report 50-341/85042

This letter responds to the notice of violation included with your Inspection Report No. 50-341/85037. This inspection was conducted by Messrs. P. M. Byron and M. E. Parker of NRC Region III on October 1 through November 30, 1985.

We trust this letter satisfactorily responds to the notice of violation cited in the inspection report. If you have questions regarding this matter, please contact Mr. Joseph E. Conen, (313) 586-5083.

Sincerely,



cc: Mr. P. M. Byron
Mr. M. D. Lynch
Mr. G. C. Wright
USNRC Document Control Desk
Washington, D. C. 20555

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THE DETROIT EDISON COMPANY

FERMI 2

NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85042

DOCKET NO. 50-341

LICENSE NO. NPF-43

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: OCTOBER 1 THROUGH NOVEMBER 30, 1985

Statement Of Violation 85042-02

10 CFR 50.73(a)(1) states in part: "The holder of an operating license for nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after discovery of the event."

Contrary to the above, the licensee has failed to submit 16 LERs within 30 days after discovery from March 20 through October 31, 1985.

Corrective Action Taken and Results Achieved

An investigation of the LER process was initiated in September 1985 after an excessive number of LERs due in August were submitted late. This investigation yielded the following information related to the late LERs.

- o Several of the subject LERs which were due on a non-working day were submitted on the next working day. The answer to question 14.10 in Supplement 1 of NUREG 1022 indicates this practice is acceptable.
- o A number of the subject LERs were discussed with members of the Region III staff. For two of these LERs, it was agreed that a late report was acceptable and an extended deadline was agreed to.
- o For the remaining LERs not submitted within 30 days of event discovery, the date of submittal has ranged from one to thirteen days late. In no case has an LER been submitted 76 days late, as stated in the Inspection Report.

During the investigation discussed above, it was determined that a problem existed with the process of LER preparation and submittal. The root cause of this violation was determined to be an inefficient process for generating initial draft LERs and inadequate resources dedicated to the development of LERs in final form for submittal. The situation was exacerbated by the relatively high number of LERs overall and compounded when clusters of LERs became due in a short time interval. Most of the late LERs fell due during these cluster periods. In addition, promptness of LER submittal was occasionally sacrificed in order to submit complete information in each report.

Corrective Action Taken and Results Achieved (Cont'd)

Prior to receiving notification of this violation, the following corrective actions were taken.

- o Based on the identified need for additional resources, the process of acquiring additional dedicated resources was initiated.
- o Temporary contract support for the preparation of final LERs was brought in to assist during peak periods.
- o The process for initial LER preparation was changed to give the responsibility for preparing initial draft reports to the staff engineer responsible for the initial investigation. This action helped ensure that all information needed for the final report would be assembled before preparation of the final report began, thereby improving the efficiency of those tasked with preparing the final report. It is also anticipated that requiring the responsible engineer to prepare the initial draft of the LER will result in more thorough and timely evaluation of these events thereby improving the prescribed corrective actions.
- o In order to eliminate delays in investigating an event, the on-call plant supervisors have been instructed to ensure that the appropriate group acknowledges their responsibilities for event investigation immediately after event occurrence.

Corrective Action To Avoid Further Violation

An additional Detroit Edison engineer has been assigned to the LER preparation function to cope with any future peaks in the production of LERs and to reduce the dependence on contract personnel. Furthermore, preliminary LERs are now being submitted within the 30 day time period for events which cannot be fully investigated in the allotted time. This practice had been previously avoided in favor of submitting complete information, even though this resulted in late submittal of several LERs. These actions, combined with the reduction in the number of reportable events anticipated as operating experience is gained, are expected to eliminate late submittal of LERs.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.