

May 23, 1988
NRC-88-0119



Nuclear
Operations

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. 50-341/88007) dated April 22, 1988
- (3) Notice of Deviation (NRC Inspection Report No. 50-341/88007) dated April 22, 1988

Subject: Response to Notices of Violation and Deviation

In NRC inspection Report No. 50-341/88007, a notice of violation and a notice of deviation were issued. Both of these notices required a written response in thirty days.

Attachment 1 to this letter is the response to the notice of violation. This violation was issued for activities which were not in accordance with 10CFR50, Appendix B, Criteria V, "Instructions Procedures, and Drawings". In order to preclude recurrences of this nature, work was stopped in the plant until the first line supervisors were counselled by their management about the need for procedural compliance.

The response to the notice of deviation is contained in attachment 2. The deviation related to documentation of testing of breakers and protective relays. The response identifies how the testing was done and where the records are retained.

Sincerely,

B. R. Sylvia
Senior Vice President

cc: A. B. Davis
R. C. Knop
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RESPONSE TO NRC INSPECTION REPORT NO. 50-341/88007

Attachment 1

During a routine inspection of maintenance activities between March 7 and 25 of 1988, four examples of inadequate procedures or failure to follow procedures were identified. A severity level IV violation was issued for noncompliance with 10CFR50, Appendix B, Criterion V, "Instruction, Procedures, and Drawings".

The four examples were as follows:

Statement Of Violation 50-341/88007-3A

No acceptance criteria or machining dimensions and tolerances were provided in the main steam isolation valve (MSIV) procedure 35.000.032, Revision 8 or work request 023B012788 for MSIV B2130F022B. The main seat of the poppet for the MSIV was inspected and machined based solely on verbal direction from the MSIV vendor representative.

Corrective Action Taken and Results Achieved

The Superintendent of Maintenance and Modifications stopped work on the job until documentation was obtained from the vendor which verified that the verbal directions had been correct. Urgent required reading was issued on March 10, 1988 to maintenance personnel reminding them of the policies relating to interfacing with vendor representatives and documentation of activity in work packages. Additionally, on March 11, 1988 work was stopped on site at the direction of management. Personnel were not allowed to return to work in the field until the first line supervisors attended training by their management on procedure compliance. The supervisors were directed to convey the training session information to their subordinates prior to having them return to work.

Corrective Actions to be Taken to Avoid Further Violations

Procedure 35.000.032 is being revised to include the information for inspecting and machining the poppet's main seat. Additionally, the vendors manual will be revised to include this same information.

Date When Full Compliance Will Be Achieved

Approval of the revised procedure and update of the vendor manual will be completed in July of 1988.

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/88007

Statement Of Violation 50-341/88007-03B

A fuel injector pump for the emergency diesel generator (EDG) 13 was removed, inspected and re-installed in accordance with verbal instructions from the vendor representative instead of by following approved procedure 35.000.052, "Emergency Diesel Generator Engine General Maintenance, " Revision 6.

Corrective Actions Taken and Results Achieved

The work package was revised to document the work that was performed. As described in the corrective actions for part A of this violation, training was provided to first line supervisors and urgent required reading was issued to maintenance personnel.

Corrective Actions To Be Taken To Avoid Further Violations

No other corrective actions for this particular instance will be taken.

Date when Full Compliance Will Be Achieved

Fermi 2 has been in full compliance since completion of the corrective actions described previously.

Statement Of Violation 50-341/88007-03C

Hydrostatic pressure testing of the jacket water system of EDG 13 was not accomplished in accordance with approved procedure 34.000.14 "Emergency Diesel Generator Inspection," Revision 8.

Discussion

Instead of using the specified hydrostatic test pump, which provides less than or equal to 50 psig as the source, the condensate system, in which pressures are normally 70 psig, was used. Additionally, another gauge, which was not required per the procedure, was installed down stream of the jacket water heat exchanger.

Corrective Actions Taken and Results Achieved

The vendor, Colt Industries, was contacted to evaluate whether the test method used could have damaged the jacket water system. Additionally, Detroit Edison's engineering staff evaluated this concern. Both parties concluded that no damage had been done to the jacket water system and that the test method was acceptable.

Corrective Actions Taken and Results Achieved (Cont')

The work package was revised to document how the work was performed. The first line supervisor who directed the installation of a gauge not required by the procedure was counselled on the need for proper testing techniques. Procedure 34.000.14 was reviewed and revised in March of 1988 to specify the use of the condensate system (P11) for testing of the water jacket system.

The training provided to the first line supervisors and the urgent required reading for maintenance personnel covered this topic.

Corrective Action To Be Taken To Avoid Further Violations

No other corrective action for this instance will be taken.

Date When Full Compliance Will Be Achieved

Fermi 2 has been in full compliance since completion of the corrective actions described in this section.

Statement Of Violation 50-341/88007-03D

Component replacements made on the control panel for EDG 13 were not classified and controlled as a modification in accordance with the requirements of procedure 11.000.04, "Design Change Process," Revision 2, Enclosure A.

Discussion

While the supplier listed the same part number for the original and replacement component, the mounting details were changed. Per procedure 11.000.004, this is a minor modification.

Corrective Actions Taken And Results Achieved

The potential design change to cover the mounting changes which allowed the component replacement was upgraded to a minor modification. An as-built notice was issued to update the applicable vendors manual. This as-built notice reflects the component replacement and its mounting detail.

A letter was issued to all nuclear engineering personnel on March 24, 1988. This letter clarified when a change must be considered a modification and when "like-for-like" replacement may be used.

Corrective Actions To Be Taken To Avoid Further Violations

No other corrective actions for this instance will be taken.

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/88007

Date When Full Compliance Will Be Achieved

Fermi 2 has been in full compliance since completion of the corrective actions described in this section.

Attachment 2

One deviation was issued from the routine safety inspection between March 7 and 25 of 1988. In the Updated Final Safety Analysis Report, Section 8.3.1.1.13.1, it was committed that breaker operating tests and protective relay tests would be performed initially and then again in one year. After that the testing was to be performed coincident with reactor shutdowns. No objective evidence was presented to the inspectors to verify these commitments had been met.

The intent of the commitments was met by performing the 4160V and 480V breaker operating and protective relay tests as follows:

Initial testing was performed as part of the checkout and initial operating (CAIO) tests. These tests were performed after the construction phase and consisted of initial equipment energization, calibration and functional testing of components.

The commitment to test again in one year was met by performance of pre-operational or acceptance tests along with verifying and applying the final protective relay settings before fuel load. In the pre-operational or acceptance tests, the adequacy of each system's individual components, instruments, interlocks, alarms, etc. was verified. Protective relay verification was performed before fuel load since construction and CAIO testing could and sometimes did alter the required relay setting.

Future testing will be performed during refueling outages in accordance with the preventive maintenance program. This section of the Updated Final Safety Analysis Report will be updated during the next annual update to clarify the intent as described above.

Documentation of CAIO testing and pre-operational or acceptance testing has been retained as part of the pre-operational startup program documentation. Relay setting sheets are maintained in the maintenance department files. These sheets document the performance of the final relay settings prior to fuel load.