



May 24, 1988
NRC-88-0138

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

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Detroit Edison to NRC Letter, EF2-64,314,
dated August 28, 1983, "Five or Greater
Commitments."
 - 3) Detroit Edison to NRC Letter, EF2-70,229,
dated January 8, 1985, "Large Bore Pipe
Hanger Sketches".

Subject: Changes to Commitments Associated with Detroit Edison's
Design Change Document (Change Paper) Incorporation
Program

During the construction phase of Fermi 2, Detroit Edison made two commitments regarding our drawing maintenance program (References 2 and 3). These commitments are associated with the incorporation of design change documents (change paper) into their base design documents. A recent review has indicated that these two commitments may be deleted when our new change paper program, which is geared towards an operating plant, is implemented. The drawing update program being implemented incorporates the basis of the two commitments and deleting them would not degrade the drawing update program.

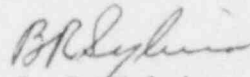
Hence, Detroit Edison is deleting the two commitments described in the enclosure. Our justification for deleting the commitments is also provided in the attachment.

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If you have any questions, please contact Mr. Girija Shukla at (313)
586-4270.

Sincerely,



B. R. Sylvia
Senior Vice President

Enclosure

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

DESCRIPTION OF COMMITMENTS AND JUSTIFICATION OF DELETION

o Detroit Edison's previous commitments regarding incorporation of design change documents:

1. Five or Greater Commitments (NRC Report No. 50-341/83-07, Noncompliance 83-07-03, Detroit Edison Letter to NRC, EF2-64,314, dated August 28, 1983).

The commitment states:

"The number of QA Level 1 design documents with five (5) or more change documents open against them shall be one hundred fifty (150) or less. The objective is that no design document shall have more than a total of five (5) change documents open against it."

To meet the stated commitment, the following actions have been taken:

- "Change document incorporation into design documents will be initiated when any drawing or specification accumulates three (3) change papers against it."
 - "Should any QA Level 1 design document attain eight (8) or more outstanding (open) change documents against it, the design document shall be identified and the incorporation of all change documents shall be expedited. The Director of Project Design will take appropriate action concerning design documents, including such action as issuing "Stop Work" directives, until the change documents have been incorporated into the affected design document."
2. Large Bore Pipe Hanger Sketches (Region III Inspection conducted during November 1984, Detroit Edison Letter to NRC EF2-70,229, dated January 8, 1985).

The commitment states:

"For the remainder of the large bore Q.A. Level 1 hanger sketches designed by Edison/SWMI (Stone and Webster - Michigan) the following is planned:"

"The sketches with two or more change documents outstanding or with two or more ABNs outstanding will be updated."

The priority for updating the sketches will be:

1. QA 1 Class 1 hangers
2. QA 1 Class 2-3 hangers

"Project procedure 3.16 "Hanger Sketches" is being revised to assure that all large bore hanger sketches are updated whenever two or more design change documents are outstanding."

o Justification for deleting the above commitments:

Our current drawing update program satisfies these two commitments. However, a review of the entire drawing population has resulted in recommendations for a new drawing update program. The new drawing update program being implemented requires that drawings are updated within a 20 or 60 day schedule as follows:

- . Drawings designated as "Control Room" are revised within 20 working days after the change document becomes "As-built" and issued. Control Room drawings are redlined in the interim.
- . All other drawings needed to operate and maintain the plant are updated within 60 working days after the change document becomes "As-built" and issued.

The new drawing update program involves more than 11,000 documents and includes drawings such as one line diagrams, Functional Operating Sketches (FOSs), P&IDs, Schematic and Wiring diagrams both safety and non-safety related.

Changes to a selected category of design documents will not be incorporated. These documents, although used to construct the plant, are of little or no use to the operating and maintenance staff. This category includes items such as civil concrete floor plan drawings, structural steel building drawings, cable tray and conduit design drawings, and hanger sketches. Therefore, these documents will no longer be updated.

The new drawing update program does not affect the status of the plant configuration control. The changes made to plant configuration are maintained independently of the drawing update program. The plant configuration is maintained by (i) identifying the documents to be affected by the change on the design change document (ii) establishing the relationship of the design document to the documents to be affected (iii) tracking the design change.

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and (iv) posting the design change documents on all control copies of design documents requested by the user.

The basis of the previous commitments was to ensure that the drawings we use are updated in a timely manner. Our new program meets this intent and in fact ensures that the drawings we normally use are updated within a specified time limit. Therefore, the two previous commitments are being deleted from our drawing update program.