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MAR 14 1986

Docket No. 50-341

The Detroit Edison Company
ATTN: Frank E. Agosti
Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

By letter dated February 15, 1986, the NRC received the enclosed request from the Safe Energy Coalition of Michigan pursuant to 10 CFR 2.206 of our regulations, to institute a proceeding to revoke the operating license of the Detroit Edison Company's Fermi 2 Nuclear Power Plant. NRC currently has the request under review.

The purpose of this letter is to give Detroit Edison the opportunity to respond to this request. If you choose to provide a response, please do so by March 28, 1986. We also request that you send a copy of your response to the petitioner at the time it is provided to us.

Should you have any questions regarding this matter, please contact either Ed Greenman or myself.

Sincerely,

"Original signed by C.E. Norelius"

Charles E. Norelius, Director
Division of Reactor Projects

Enclosure: As stated

See Attached Distribution

RIII
Greenman/las
3/17/86

RIII
Wright
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Benson
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Norelius
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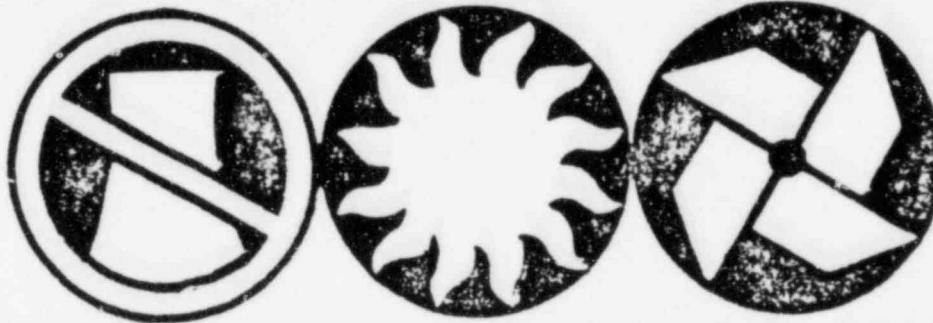
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SAFE ENERGY COALITION OF MICHIGAN

P.O. BOX 531 MONROE, MICHIGAN 48161

February 15, 1986

Mr. Harold Denton
Director
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. James Keppler
Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Chicago, IL 60137

Mr. James Taylor
Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Messrs: Denton, Keppler and Taylor:

The Safe Energy Coalition of Michigan (SECOM), pursuant to the code of Federal Regulations for Energy (10) under Section 2.206, "Requests for Action," and Section 2.202, "Order to Show Cause," petitions the U.S. Nuclear Regulatory Commission, including the Offices of Nuclear Reactor Regulation, Inspection and Enforcement, and Region III, requesting that these offices institute immediate proceedings regarding the ineffective and incompetently managed and operated licensee program at the Fermi 2 nuclear power plant.

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The immediate actions requested in the SECOM petition include the following:

(1) Elevated enforcement that would issue an order to institute an immediate proceeding to revoke the Fermi 2 license (NPF-43).

(2) Serve on the licensee, the Detroit Edison Company, a show cause order and demand hearings to set forth the facts and law on which the licensee relies to respond to the forthcoming allegations presented in this petition as to why the NRC should not revoke the Fermi 2 license.

The Safe Energy Coalition of Michigan contends that the following five allegations and the supportive facts and documentation in this petition request, warrant your immediate actions so that prevention of any further degradation of management and equipment will not occur. Because of the history at the Fermi 2 nuclear power plant and the present situation Detroit Edison is embroiled in, the public's health and safety, the protection of the environment and above all the interest of the communities surrounding the Fermi 2 nuclear facility, are the basis for mandated action by the Nuclear Regulatory Commission as provided in the Atomic Energy Act and the Energy Reorganization Act, as well as the accompanying regulations.

The SECOM allegations set forth in this petition are as follows:

(1) The U.S. Nuclear Regulatory Commission has not elevated the enforcement actions against the licensee to the necessary levels mandated and provided for in the Acts and Code of Federal Regulations, as a result of the events that have occurred at the Fermi 2 nuclear power plant

(2) Continuing lack of management controls at levels required to meet NRC regulations and requirements; the result has been ineffective programs and incompetence at critical levels of the organization including operations, maintenance, security, and engineering

(3) The twenty-six violations issued recently were willful in other words, showed careless disregard for requirements

(4) The licensee has been unable to comply with certain NRC requirements.

(5) The recently released operations improvement plan will not provide the substantive changes needed to correct the serious breakdown of operations at the Fermi 2 nuclear plant.

Supportive Facts As To Allegations

In regard to the SECOM Allegations, (specifically no. 1 & 2 but not exclusively), the purpose of the NRC enforcement actions is to "promote and protect the radiological health and safety of the public including employees' health and safety, the common defense and security and the environment (10 CFR Part 2 Appendix C). The regulations for enforcement procedures also are for the purpose of

- * ensuring compliance with NRC regulations and license conditions
- * obtaining prompt correction of non-compliance
- * deterring future noncompliance, and
- * encouraging improvement of licensee performance, and by example, that of industry, including the prompt identification and reporting of potential safety problems (10 CFR Appendix C Pg 128)

It is important to note that the Detroit Edison Company has been at fault in every one of the areas at the Fermi 2 nuclear plant which will be discussed throughout this petition. In addition, the Nuclear Regulatory Commission has the authority for "prompt and vigorous enforcement action", that "will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of

compliance which the NRC expects of its licensees." The regulations (10 CFR Part 2 Appendix C Pg 128) state that "In no case, however, will licensees who cannot achieve and maintain adequate levels of protection be permitted to conduct licensed activities" (10 CFR Part 2 Appendix C Pg 128)

The procedural framework of the Nuclear Regulatory Commission authorizes the agency "to make orders immediately effective if the public health, safety or interest so requires, or in the case of an order to show cause, if the alleged violation is willful," (10 CFR Part 2 Appendix C Pg 128) - the latter of which is one of SECOM's allegations and will be discussed later.

Furthermore, general policy for elevated NRC enforcement actions include "civil penalties, orders modifying, or suspending, or revoking licenses, or orders to cease and desist from designated activities" (10 CFR Part 2 Appendix C IV Pg 128-29). The SECOM petition request for revocation of the Fermi 2 license is supported in other sections of the law. Section 186(a) of the Atomic Energy Act of 1954 (P.L. 703) authorizes the NRC to revoke licenses under certain circumstances:

Any license may be revoked for any material false statement in the application or any statement of fact required under Section 182, or because of conditions revealed by such application or statement of fact or any report, record or inspection or other means which would warrant the Commission to refuse to grant a license on any original application, or for failure to construct or operate a facility in accordance with the terms of the construction permit or license or the technical specifications in the application, or for violation of, or failure to observe, any terms and provisions of this Act or of any regulation of the commission. (Pg 955)

Indeed, the licensee, The Detroit Edison Company, has been involved in failure to operate their facility in accordance with the terms of the license by not following the technical specifications, and for violations and the failure to observe the law and regulations of the commission. The ramifications for these failures are provided for in the issuance of enforcement actions, some of which have been mentioned. (Director, Division of Reactor Projects, NRC Region III to Wayne Jens, Detroit Edison Company former Vice-President Nuclear Operations). The Atomic Energy Act of 1954, (Section 234), the Energy Reorganization Act of 1974, (Section 206), and the Code of Federal Regulations (10)(Part 2, Appendix C) (B) under "Civil Penalty" describes the provisions for violations by stating that:

Ineffective licensee programs for problem identification or correction are unacceptable. In cases involving willfulness, flagrant NRC - identified violations or serious breakdown in management controls, the Nuclear Regulatory Commission intends to apply its full enforcement authority where such action is warranted, including issuing appropriate orders and assessing civil penalties for continuing violations...

In fact, this part of the regulations describes the circumstances at the Detroit Edison Company's Fermi 2 nuclear power plant very accurately. This is why the Safe Energy Coalition of Michigan has asked that elevated enforcement authority be taken by the NRC. The facts, reported in letters, and other investigative documents between the NRC and Detroit Edison company, we believe, warrant such elevated actions.

The request for actions and the allegations set forth in

this petition are supported by the summary of the problems at Fermi 2 in a December 24, 1985 letter from James Keppler, Region III Administrator to Wayne Jens, former Vice-President of Nuclear Operations, Detroit Edison Company. In this NRC letter Mr. Keppler states that the Fermi 2 nuclear power plant:

has experienced numerous events involving operational errors and degraded plant equipment. Furthermore, programmatic weaknesses have been identified by the NRC concerning engineering and security. A number of events occurred despite the efforts of your Company to improve the regulatory performance of the Fermi 2 station.

The events of concern have been attributed to four functional areas which are the: operations group, maintenance group, engineering staff, and security organization. Mr. Keppler continued in the letter that

the diversity of problems and functional areas involved with these problems indicate to the NRC that the present management systems have been ineffective. If left uncorrected, and current trends continue, significant safety problems may develop at the Fermi 2 facility.

Further the safety significance was mitigated only by the operating history (Inspection report 50-341185040 (DRP)), because of the length of time and the low power levels.

In addition to the situation described in Mr. Keppler's letter of December 24th, the results of a special NRC safety inspection conducted during the period of July 1 through October 15, 1985, of activities at Fermi 2 (Inspection Report No. 50-341/85040 (DRP)) identified twenty-six violations of NRC requirements. The report summary states:

The majority of these fall into the category of failure to follow procedures. This represents a breakdown in the licensee's ability to operate the plant in accordance with

prescribed procedures as required by the technical
specifications (pg 15)

The licensee reviewed monthly surveillances from Jan - June 1985 of the problems the operations section had in following procedures. "The licensee had sufficient knowledge of procedural compliance problems to initiate corrective actions rather than wait for a larger data base." (Pg 15) The breakdown occurred despite this. Many of the violations identified in the report were repetitive, and the NRC stated "they demonstrated a major breakdown in the licensee's administrative controls to safely operate the plant." (Pg 16)

The decision regarding NRC proposed enforcement action based on the findings of this inspection report are to be issued in separate correspondence to the licensee when a decision is reached by Region III. (January 7, 1986 letter, from Charles Norelius, Director, Division of Reactor Projects, NRC Region III to Wayne Jens, Detroit Edison Company.) SECOM has been told in several telephone conversations in January 1986 with Region III of the NRC that civil penalties would be forthcoming.

In addition to the twenty-six (26) violations incurred to date by the licensee, at least eighty (80) Licensee Event Reports have been filed since fuel-loading in March, 1985. Review of these safety events has also raised considerable criticism from the NRC. At a September 10, 1985 review meeting at Region III headquarters in Chicago between the NRC staff and Detroit Edison management, Detroit Edison's Bob Lenart, Assistant Manager, Nuclear Production, admitted that the company's performance was

"less than expected" and the "problems are greater than expected". The company representative Mr. Lenart also stated, "We have had numerous problems; the structure (of the organization at Fermi 2) is not finely tuned or well put together". Mr. Keppler, Region III administrator, told the Detroit Edison Company that they have had a "lousy performance" and that the "errors were excessive." Mr. Keppler went on to say that "our confidence is shaken" and "today's climate does not permit an expensive learning process."

Furthermore, a licensee event follow up (Inspection Report 50-341/85042 (DRP)event) conducted on October 1 through November 30, 1985 also was critical of the Detroit Edison Company:

the inspectors' review of the LERs have revealed several areas of weakness in the licensee's program. Discussion with the licensee demonstrated that they do not have an effective tracking system and are unable to status LERs.
(Pg 3) (SECOM Allegation #4)

Also in this inspection report section (94700) the inspectors criticized the licensee's safety evaluations of events "to be less than adequate, referring to LER No. 85-060 "Primary Containment Valve Left Open" (October 11, 1985). This event constituted a breach of containment and the condition existed for 2 1/2 months undetected by the licensee. (Three violations have been issued on this event.) The inspectors considered the safety evaluation statement filed with the NRC and concluded that this statement "does not constitute a safety evaluation" and that "this is not an isolated case". (Pg 4) Finally, the inspectors state that they consider the licensee's "LER program to be less

than adequate and the licensee must take the necessary steps to strengthen their program". (Pg 4)

On January 9, 1986 Mr. Keppler, Regional Administrator NRC, sent Mr. Walter McCarthy, Chief Executive Officer, Detroit Edison Company an internal NRC Region III memorandum dated January 3, 1986. The memorandum was written by Stevie DuPont, Reactor Inspector, Test Programs Section, Engineering Branch, Division of Reactor Safety, with the subject being "LER Review of 1985 Fermi 2 LERs". DuPont performed the review "as a result of my own (Stevie DuPont's) personal concerns with the quality of Fermi's LERs". (Pg 4)

The purpose of DuPont's review was "to determine whether the licensee adequately evaluated the events for root causes and properly corrected for root causes". (Pg 1) The review identified three areas of concern:

- 1) Lack of knowledge or status of equipment and systems
- 2) Lack of control of operations and evaluations
- 3) Failure to follow procedures.

In response to this major breakdown in controls at the Fermi 2 plant and the licensee's inability to meet NRC requirements and regulations, the NRC has taken 2 major steps in the progression of possible actions that the regulations stipulate. In Table 2, "Examples of Progression of Escalated Enforcement Actions for Similar Violations in the Same Activity Area under the Same License" of 10 CFR, Part 2 Appendix C are the following actions the NRC can issue:

a) Civil Penalty

b) Suspension of affected operations until the Office Director is satisfied that there is reasonable assurance that the licensee can operate in compliance with the applicable requirements, or modifications of the license, as appropriate

c) Show cause order for modification or revocation of the license, as appropriate

d) Further action, as appropriate

To date, as mentioned previously, the Nuclear Regulatory Commission has issued twenty-six (26) violations and SECOM has verbally been assured by Region III that civil penalties will be forthcoming. This is the first level of action (a). The second enforcement action the NRC has taken, as relates to step (b) in Table 2, was the issuance of a Confirmatory Action Letter on July 16, 1985 restricting the licensee to 5% of full operating power at Fermi 2. The letter was issued by Region III due to the July 2 inadvertent criticality incident when control rods were pulled out-of-sequence. Nine examples of violations of technical specifications were identified in the evaluation of this event. (Inspection Report No. 50-341/85040 (DRP)). The Safe Energy Coalition of Michigan commends the NRC for these warranted enforcement actions because of the history of serious problems at Fermi 2.

However, the Safe Energy Coalition of Michigan believes that because of the licensee wrongdoings and because of the ineffective and incompetently managed and operated licensee program, that the NRC must elevate the enforcement to the next level, a show cause order to revoke the license as requested in

this petition under 10 CFR 2.206 and 2.202.

The twenty-six (26) violations issued stand alone as enough evidence on whether elevated enforcement should be instituted. "Section 161 of the Atomic Energy Act authorizes the NRC to conduct inspections and investigations and to issue orders as may be necessary or desirable to promote the common defense and security or to protect health or to minimize danger to life or property" (10 CFR Part 2 Appendix C).

The NRC actions to date have not provided the necessary assurance to the communities surrounding Fermi 2 that the problems at Fermi 2 have been fully resolved or will be. The licensee must be penalized to the next level of enforcement. There should never be recurrence of such a major breakdown in licensee control to safely operate the plant. Indeed Fermi 2 should never be allowed to start up. Appendix C of 10 CFR "Purposes of Enforcement", has clearly stated your mandate to take "prompt and vigorous enforcement action" and that it "will be taken when dealing with licensees", as the Detroit Edison Company, "who do not achieve the necessary meticulous attention to detail and the high standard of compliance which the NRC expects of its licensees." (Pg 128)

The regulations further allow the NRC to issue orders in addition to civil penalties (Pg 132) 10 CFR --- and revocation orders may be used when a licensee is unable to comply with NRC requirements, as has been the case with the licensee and as alleged in the SECOM Allegation #4. The operating history of

the licensee presented in part in this petition has clearly shown that the licensee, the Detroit Edison Company, has been unable to comply with NRC requirements. In addition to the operational errors and poor regulatory performance mentioned in the petition, "the security organization has been unable to properly implement the provisions of the security plan as evidenced by the numerous violations identified by both Detroit Edison and the NRC" (December 24, 1985 Letter, Keppler to Jens) This gives additional support for revocation of the license.

The regulations also state that:

Orders are made effective immediately without prior opportunity for hearing whenever it is determined that the public health, interest, or safety so requires, or when the order is responding to a violation involving willfulness. The term willfulness as used here embraces a spectrum of violations ranging from deliberate intent to violate or falsify to and including careless disregard for requirements. (10 CFR Pg 133 SECOM Allegation #3)

In addition, the licensee "will ordinarily be afforded an opportunity to show cause why the order should not be issued in the proposed manner." (10 CFR Pg 133) the latter is also included in 10 CFR Section 2.202, "Order to Show Cause," and which allows the NRC to:

institute proceedings to modify, suspend, or revoke a license or for such other action as may be proper by serving on the licensee an order to show cause which will (1) allege the violations with which the licensee is charged, or the potentially hazardous conditions or other facts deemed to be sufficient ground for the proposed action (10 CFR 2.202)

These regulations provide for the Safe Energy Coalition of Michigan's two requests set forth in this petition: proceedings to revoke the license and an order to show cause. The

substantial safety issues raised by the NRC in its documents as to the licensee history once again supports the requests as allowed in the aforementioned regulations.

The SECOM Allegation #3 should be discussed in terms of the regulations. SECOM alleges that the twenty-six violations issued recently were willful, or showed careless disregard for requirements. As stated before the regulations allow for orders to be issued when a violation involves willfulness. When the Director, Office of Inspection and Enforcement, "finds that the public health, safety, or interest so requires, or that the violation is willfull the notice of violation may be omitted and an order to show cause issued.' (10 CFR Section 2.202(c)) The public's interest in the alleged willful violations should be an additional impetus for the NRC to fulfill the SECOM requests for action.

Allegation #3 of willfulness has its support detailed in the NRC Inspection Report mentioned prior to this and issued November 14, 1985 (Report No. 50-341/85040(DRP)) which involved inspections on July 1 through October 15, 1985 and Management Meetings on July 23 and September 10, 1985. Further support is found in the January 3, 1986 Stevie DuPont, Region III memorandum on "LER Review of 1985 Fermi 2 LER's", also previously raised. Some examples of the alleged willful violations and events at Fermi 2 include the following:

- 1) Out of Sequence Rod Pull/Inadvertent Criticality, (July 1, 1985) - Licensee failed to adhere to the provisions of technical specification 6.8.1a covering the startup of the reactor. The Nuclear Production Organization did not provide the appropriate supervision of activities nor was

the Nuclear Shift Supervisor successfully discharging his duties. The SAO or Shift Operations Advisor failed to become involved in the resolution of short period alarms.

2) Control Room HVAC (July 1985) - The supply fan switch was out-of-specification position for 27 shift turnovers, even though a CRIS "dot" had been placed on the switch and the event entered into the equipment status file. These latter two went unnoticed for 27 shift turnovers. Subsequent reviews of the log either failed to note the entry or failed to recognize significance (6 NSS turnovers, 15 NASS turnovers, 27 NSO turnovers). The licensee also failed to evaluate the consequences of removing components from service.

3) RCIC/Core Spray Room Cooler (July 1985) - The High Pressure Core Injection (HPCI) had been inoperable from July 11 - July 24 so that for sixteen hours the HPCI, RCIC and Division I core spray systems were inoperable while the reactor was in the startup condition. The licensee violated Technical Specification 6.8.1.a - failed to review past log entries, failed to write a work order (PN-21) to de-energize the feeder breaker, the failure to observe for two shift turnovers the out-of-position RCIC/Core Spray room cooler fan switch, and the licensee failed to evaluate the consequences of removing components from service (Limiting Conditions for Operations)

4) Cooling Tower Bypass Valve (July 26, 1985) NPF-43 License Condition 2.c.(9)(d) was apparently violated. This valve was closed and de-energized but the license requires it to be open and de-energized. This affected the Division I Emergency Diesel Generators, and all Division I emergency core cooling systems were inoperable including the core spray and residual heat removal systems. By chance the licensee complied with the Limiting Condition for Operation (LCO) as a result of the failure of the South Reactor Feed Pump on July 23, 1985.

5) Hydrogen Recombiner - Work Order PN-21 269327, was completed on June 20, 1985, by completing maintenance on the Division II hydrogen recombinder. The work order stated that post maintenance testing was required but the Nuclear Shift Supervisor signed the order off without the leakage test having been done. The licensee did not take action as required in technical specification 3.0.3, exceeded the 30 day LCO limit, and did not place the plant in hot shutdown within six hours. The leakage rate was in excess of allowable containment leakage.

6) Breach of Primary Containment Integrity - On September 2, 1985 a primary containment boundary valve (containment monitoring system) was discovered open and uncapped and had been so since June 20, 1985. The Nuclear Shift Supervisor was not informed for 39 hours after the discovery. The

licensee failed to maintain containment integrity and did not follow the required technical specifications. The procedural documents for implementation failed to identify the required documents.

These are just a few examples supporting SECOM's Allegations, especially 3 and 4. Besides these violations, the eighty (80) Licensee Event Reports are filled with the licensee's willfulness and inability to follow NRC requirement. These include missed surveillances such as Rad/Chem unaware of out-of-service equipment, unavailabvle statusing to verify operability of equipment, inability to control operations such as controlling equipment and testing, inadequate understanding of duties such that the Operations Staff failed to perform required functions, failure to follow procedures, weakness in training of personnel, lack of restoration of equipment to service, extreme weakness in general knowledge of Instrument and Control personnel of their jobs and functions. (January 3, 1986 DuPont, Region III memorandum) These very serious examples of safety violations should prompt the immediate attention to the SECOM requests. The prevention of a serious accident must be guaranteed by the NRC taking elevated enforcement action.

The final SECOM Allegation #5, regarding the recently released operations improvement plan states that this plan will not provide the substantive changes needed to correct the serious breakdown of operations at the Fermi 2 nuclear plant. Indeed, it is our contention that the breakdown of operations has been an ongoing problem from the early 1970's as documented in the Michigan Public Service Commission Staff Report of February,

1984, Staff Investigation of Enrico Fermi 2 Nuclear Power Project.

On October 10, 1985 the Detroit Edison Company issued its Reactor Operations Improvement Plan in a letter to Mr. James Keppler, Region III (VP-85-0198). Additional information regarding the plan was submitted on November 27, 1985 in letter VP-85-0219 and on January 29, 1986 the licensee issued its "Response to Request for Information Pursuant to 10 CFR 50.54(f)" VP-86-0008. This is the licensee response to the December 24, 1985 Keppler letter asking for more information to allow the NRC to determine whether or not the Fermi 2 license should be modified, suspended, or revoked.

Detroit Edison claims in VP-85-0198 that the root causes of the Fermi 2 problems were due to "inefficient and administratively burdensome procedures". The licensee claims a commitment to excellence and that the corrective actions that are to be implemented will assure that operational events are behind them and will not recur. The licensee claims their analysis has identified the problem areas that needed to be resolved before performance could improve. The licensee states, "On the strength of this plan and our people, I firmly believe that our performance has already improved and will get even better".

It is unclear to SECOM how more management with the same people in charge, except for the recent replacement of Wayne Jens, Vice-President of Nuclear Operations, will improve the serious situation to the level of perfection that is needed to

operate and maintain a safe nuclear plant. SECOM is not convinced that these changes which the Detroit Edison Company proposes can give the level of confidence necessary to operate this plant.

The assumption is made by the licensee that management can evaluate the situation and the problems accurately, that they know what they are doing. The record of operations at Fermi 2 clearly shows the opposite to be true. Even with their enthusiastic optimism for objective monitoring criteria, independent monitoring, reviews, and verification, the same ineffective organization will be providing the proposed changes.

The most recent plan VP-86-0008 of January 29, 1986 calls for the Development of a Nuclear Operations Improvement Plan to be reviewed by the Independent Overview Committee of outside experts and ultimately the Detroit Edison Board Nuclear Review Committee and Walter McCarthy, Chairman of the licensee board. In addition, a Security Improvement Plan will be implemented. These plans are to address planning, accountability, attitude, communications, teamwork, follow-up, and training in the entire organization to "assure improved regulatory, operating, engineering, maintenance, and security procedures". The plan is to be initiated no later than May 1, 1986 and full implementation is to occur by July 1, 1986.

Walter McCarthy claims that new management, the plant operators, and support staff will provide for "demonstrated satisfactory performance". The plan contains few substantive changes and plant history supports SECOM's claim that this

company cannot operate and manage Fermi 2 and guarantee that NRC laws and regulations will be followed in the future and that the public health and safety and the protection of the environment will not be jeopardized. This has not been the case since fuel loading March 27, 1985 and our allegation stands that the situation will not be substantively changed in the future.

The licensee has hired consultants since 1974 including the Institute of Nuclear Power Operation, (1982-83), the Management Analysis Company (1979), Bechtel Power Corporation (1978), Commonwealth Edison (1978), Daniel Construction Company (1974), University of Texas/Department of Energy Study (1979), Stone & Webster Engineering Consultants (1979), Cygna (1982-83), Duke Power Company (1984). In addition the Detroit Edison Company has formed its own internal audit programs and review committees, to make changes in operations and management (1978, 1979, 1980). (Michigan Public Service commission Staff Report, 1984).

According to the (MPSC) staff report of 1984, Edison's Project Management Organization was adopted early in the Fermi 2 project and its concept is widely used in the industry. The Staff report states that there has been a long history of problems at Fermi 2 and that the methods of operation have been problematic from the early stages of design and construction. "The construction and planning activities needed strong and dynamic management" and "the project was stagnating due to weak and relaxed controls". (Pg 124) Especially significant from the history of this plant, is that Detroit Edison's problems continue with "lack of attention to detail at all levels of the

organization" (Wayne Jens February 13, 1985 meeting with the NRC at Fermi 2). As early as 1974, the Daniel Construction Company Review found that:

Project Controls were found inadequate due to inadequate document control, a poor materials management system and overall lack of control in the reporting system. Under Quality Assurance major weaknesses were found in the organization make-up, inadequacy of QA - document control (Pg 121)

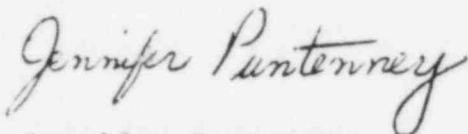
The Management Analysis Corporation's review in 1979 of the Fermi 2 project revealed that there was "inadequate planning and lack of communication". The Fermi 2 project was reorganized as a result of this review. Another review by INPO in 1982-83 criticized the licensee's "serious defects in the operator training program, major weaknesses in radiation protection areas, inadequate staffing, and sloppy procedures and inefficient testing". (Pg 263) This past history of problems, the recommended and implemented changes of the operations and management at Fermi 2 has shed light on the overall continuing ineffectiveness the licensee is plagued with. If sixteen years of experience with numerous reviews have not helped the past problems how can the licensee today with its so-called "new management structures" try to correct the similar and identical problems that just keep recurring?

SECOM firmly believes that there has been little done to assure the NRC and the public that the Detroit Edison Company can change. The Fermi 2 license should be revoked. It is imperative that the U.S. Nuclear Regulatory Commission implement the SECOM requests for action by instituting proceedings for revocation of

the Fermi 2 license and the issuance of a show cause order demanding hearings.

This RECOM request for action is based on an analysis of available documentation that starkly reveals a pattern of oversight and neglect so deep and pervasive that only federal action can protect the health and safety of the citizens of Michigan.

Respectfully submitted,



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