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DINB

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September 20, 1985
RC-LG-85-0016

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

Dear Mr. Keppler:

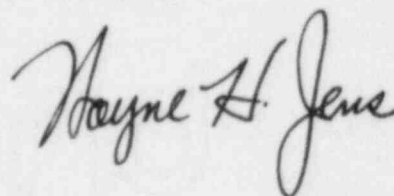
Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Detroit Edison Response
Inspection Report 50-341/85029

This letter responds to the unresolved items described in your Inspection Report No. 50-341/85029. This inspection was conducted by Messrs. P. M. Byron, M. E. Parker, D. C. Jones, and R. A. Paul of NRC Region III on June 1 through 30, 1985.

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

Sincerely,



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

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THE DETROIT EDISON COMPANY

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NUCLEAR OPERATIONS ORGANIZATION

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85029

DOCKET NO. 50-341

LICENSE NO. NPF-43

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: JUNE 1 THROUGH 30, 1985

Description of Unresolved Item 85029-01

The licensee has reviewed 217 valves to ensure their accessibility for manual operation. This review resulted in the addition of some form of accessibility aid for a number of these valves. The licensee has also developed a program to address the issue of serviceability. This program will address maintenance considerations for the same valves previously reviewed for operability.

This item requires further review and evaluation and is considered an unresolved item pending completion of the serviceability program and subsequent NRC inspection.

Detroit Edison Response

The serviceability program has been broken down into 3 phases, as described below:

Phase I - Evaluation of Serviceability

- A. Valves listed in the operability program will be evaluated on the following priority basis:
 - 1. Enhancements for valves yielding the largest ALARA savings
 - 2. Critical LLRT valves (86) required for safe plant shutdown (not included in item 1, above)
 - 3. Valves with accessibility problems identified by the operability review
 - 4. Remaining valves requiring accessibility for routine servicing
- B. Experienced maintenance personnel will perform a walkdown of the subject valves using valve maintainability check lists based on EPRI Report NP-3588, Maintainability Assessment. The following factors will be considered in assessing the need for additional serviceability features:
 - 1. Potential radiation exposure (ALARA)
 - 2. Personnel safety
 - 3. Personnel/equipment access
 - 4. Rigging requirements
 - 5. External interferences
 - 6. Special tooling/equipment requirements

Detroit Edison Response (Continued)

7. Interaction with other activities in the vicinity

8. Physical location

The serviceability evaluation will be completed by February 1, 1986.

Phase II - Initiate Engineering Work

Based on the evaluations performed in Phase I, functional requirements and conceptual design recommendations will be developed for the installation of serviceability aids, considering ALARA constraints, temporary versus permanent installation, and physical location constraints and interferences. These recommendations and their implementation schedule will be issued for engineering evaluation (as necessary) by April 1, 1986.

Phase III - Installation of Serviceability Features

Before the end of the first refueling outage, 50% of the permanent serviceability features will be installed. An additional 30% will be installed by the end of the second refueling outage, and the final 20% will be installed by the end of the third refueling outage.

Description of Unresolved Item 85029-03

During maintenance of the Reactor Water Cleanup (RWCU) pump, several problems with Procedure 35.000.68, "RWCU Recirculation Pump Rotating Assembly-Removal and Installation," and its implementation were noted, as follows:

- o During disassembly, the procedure sections used in draining the bearing housing oil and the sections prescribing rigging and hoisting for removal of the back pull-out section of the pump were not implemented, as required.
- o The procedure does not require removal of casing studs during disassembly, even though they interfere with the removal of the back pull out section.
- o During reassembly, the procedure steps were not performed in the required sequence.
- o Lock nuts used to secure the pump alignment screws in place had not been tightened.
- o The procedure has no provision for hot alignment even though the pump is operated up to 575°F.

Detroit Edison Response

Background

The PN-21 and the Attachment A documentation package instructed craft personnel to investigate and repair the seal in accordance with Procedure 35.000.68 Revision 1. The instruction also stated to contact the Plant Support Engineer (PSE) prior to disassembly for further information. The PSE and Maintenance Technical Coordinator (MTC) were aware of a General Electric Field Disposition Instruction, FDI-119-33800, prescribing modifications to improve seal life. An Engineering Design Package (EDP) to implement this FDI was under development but had not been issued and some of the required parts were unavailable. However, because some internal damage related to the seal wear problem was noted during disassembly of the pump, it was determined that partial implementation of this FDI would reduce the risk of additional damage and provide some interim improvement in seal life. This work was beyond the original work scope of the PN-21/Attachment A, and therefore, it should have been incorporated into the work package before being worked. Because work was being performed under the maintenance procedure and the FDI concurrently, conflicting work direction resulted. This confusion may have contributed to the errors in implementing the maintenance procedure.

Detroit Edison Response (Continued)

Detroit Edison has concluded that the deviations described resulted primarily from the lack of adherence to the written procedural requirements by the involved craft personnel. However, confusion caused by the partial implementation of FDI-119-33800 without a revised work package may have been a contributing factor.

Corrective Actions

The damage noted during disassembly of the pump and the interim measures taken (partial implementation of FDI-119-33800) were documented in DER NP-85-0292. This DER also documents the remaining corrective actions including the work required to complete the FDI. These actions include completion of EDP-1735 and revision of the maintenance procedure (35.000.68) to reflect the changes in assembly/ disassembly instructions recommended by the FDI. These procedure revisions, in conjunction with revisions suggested by the craftsmen who performed this procedure will resolve the interference problem with the casing studs, provide specific alignment requirements (including use of the lock nuts), correct the reassembly sequence, and correct additional problems noted during performance of the activity.

The maintenance general foreman has issued a memorandum to all maintenance foremen and nuclear general maintenance journeymen to emphasize that there can be no excuse for procedure noncompliance. To convey this message throughout the maintenance department, an article is being prepared for the maintenance group newsletter. This article will serve to remind people to stop work and have work packages revised when the packages are found to be inadequate. In addition, a similar reminder for all Fermi 2 personnel will be included in a future edition of the site newsletter.