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September 19, 1985
RC-LG-85-0018



Nuclear
Operations

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

Dear Mr. Keppler:

- References: (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- (2) Detroit Edison letter RC-LG-85-0015,
dated September 5, 1985

Subject: Detroit Edison Response
Inspection Report 50-341/85031

Reference 2 responded to four of the program weaknesses described in your Inspection Report No. 50-341/85031. This letter responds to the remaining four program weaknesses identified in that report.

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

Sincerely,

cc: P. M. Byron
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. 50-341/85031

DOCKET NO. 50-341

LICENSE NO. NPF-43

INSPECTION AT: FERMI 2, NEWPORT, MICHIGAN

INSPECTION CONDUCTED: JUNE 17 THROUGH 21, 1985

RESPONSE TO NRC INSPECTION REPORT NO. 50-341/85031

Weakness 85031C

There is a lack of feedback on the quality of maintenance procedures used in the field.

Detroit Edison Response

Maintenance Instruction MI-M049, "Control and Use of Procedures/Instructions within the Maintenance Section," has been revised to address this concern. Section 4.3, "User Feedback," has been added to this procedure to provide a mechanism for soliciting user feedback via Professional Advice (PRO/ADS) Comment forms. These forms are available at the Maintenance Foreman's office, and they allow maintenance personnel to comment on quality, safety, and workability aspects of their work procedures. When completed, they can be sent either directly or through the work package closure process to the Lead Technical Writer (Maintenance Department) for evaluation. Comments are either incorporated or resolved with the originator.

Weakness 85031E

The revising of prints and training of operators after a plant modification may not be timely.

Detroit Edison Response

Plant modifications are issued with Engineering Design Packages (EDP). An EDP is broken down into a package of individual work orders (PN21) to be issued for implementation in the plant. When all of the PN21s for a given EDP are completed, the EDP status is changed from AFC (approved for controlled issue) to ASB (as-built). Once this occurs, drawing revisions can be issued. Similarly, plant documents (eg, procedures, programs) required before operating the changed system had to be revised before an EDP implementation package was signed "Ready for Service." However, completion of an EDP is not required before returning a system or component to service. Closure of individual PN21s drives this process. Therefore, during the time interval between completion of one field activity (PN21 closure) and completion of the remaining hardware and software actions required to complete an EDP, the drawings and procedures used by the operators would not necessarily reflect changes in the equipment.

In order to remedy this situation, Procedures 12.000.64, "EDP Implementation Procedure," and 12.000.15, "Work Order Processing," are being revised to ensure that the operators have accurate information throughout the EDP implementation process. These revisions will require that control room drawings have the correct information posted on the face of the drawing and tagging center drawings are posted with the EDP status. This posting will be done before operations accepts the equipment for service by identifying the affected control center drawings on the PN21 Attachment A. In addition, procedures requiring change because of work done under a PN21 will be identified in the PN21 work package. These procedures will be revised before operations accepts the equipment for service.

Nuclear Training reviews EDPs to identify necessary changes in training programs. However, to ensure that operators are adequately trained in a timely fashion when equipment is returned to service after modification, the PN21 package for a modification will allow the Operations Engineer to prescribe specific training requirements, such as on-shift instruction, urgent required reading, night orders, etc. which should be completed before accepting the equipment for service.

Weakness 85031F

There appears to be difficulties in the performance and review of voluminous work packages.

Detroit Edison Repsonse

Guidelines are being developed for use by the Maintenance Technical Coordinators (MTC) to help them optimize the size and format of work packages. The following subjects will be covered by these guidelines:

- o Combining common work tasks of a simple nature into one package.
- o Breaking complex work tasks into more than one package to reduce the scope of the individual packages.
- o Performing work in more than one location is allowed with one work package (as allowed by Procedure 12.000.15).
- o Use of shop orders for portions of tasks which do not affect an operating system will support larger tasks with the minimum impact on work in the plant.
- o Use of key tagging orders to provide common protective tagging for multiple tasks on a specific system.
- o Use of work package notebooks for large work packages to organize the information and maintain order as the package is worked and reviewed.

In addition, Procedure 12.000.15, "Work Order Processing," is being reviewed to identify areas where the work order process can be simplified. Developing standardized work packages and reducing the required content of work packages are two areas under consideration to improve this process.

Weakness 85031E

There is an unrealistic time imposed by the action statement of Technical Specification 3.4.2.1.

Response

The referenced action statement requires the operator to trip the plant in the event that a safety relief valve (SRV) is stuck open and cannot be reclosed within two (2) minutes. The specified time frame for reclosing a stuck open SRV is identical to the requirement specified in the Standard Technical Specifications, and it is based on maintaining the ability of the suppression chamber to perform its required functions by limiting its temperature during reactor operation. Any application to change this time limit must include the technical basis demonstrating the acceptability of the proposed change.

In order to determine the acceptability of increasing this time period, it is necessary to determine the actual suppression chamber temperature response to an open SRV. Test procedure DEMO.HUO.726, "Torus Bulk Temperature Determination," is being modified to provide the necessary test data. This test will be performed during the Startup Test Phase, and a request to change the Technical Specifications will be submitted to the NRC if it can be justified by the test results.