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Nuclear
Operations

54-342

May 9, 1986

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

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Dear Mr. Keppler:

Reference: 1) Detroit Edison to NRC Letter, "Response to Request for Information Pursuant to 10CFR50.54(f)", VP-86-0008, January 29, 1986

Subject: Nuclear Operations Improvement Plan

Pursuant to the commitment made in Reference 1 above, Detroit Edison has been developing a Nuclear Operations Improvement Plan (NOIP) for Fermi 2. The purpose of the Plan is to effect improvements in the overall management of Fermi 2; in Nuclear Operations' ability to recognize and respond to problems which could affect plant safety; and, in management controls to assure improved regulatory, operating, engineering, maintenance and security performance. A copy of that Plan is enclosed.

The Plan was developed utilizing the Company's Corporate strategic planning process which has proven successful many times in the past. This process provides a comprehensive and systematic approach to identifying areas needing improvement or change and for determining the actions necessary to bring about the desired results. Emphasis was placed on those concerns expressed in your letter of December 24, 1985, the problems identified and recommendations made by the Independent Overview Committee in their report dated January 30, 1986, and areas identified during Nuclear Operations' own introspective management review.

While the Fermi 2 senior managers established the mission, goals, and strategies, the specific actions required to accomplish these objectives were developed with input from other levels of the Fermi 2 management team. As a result, the Nuclear Operations Improvement Plan contains the actions necessary to ensure that the desired improvements are obtained.

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In their 1985 Annual Report, INPO indicated that "nuclear plants with high equivalent availability, small numbers of forced outages, few unplanned scrams, few significant events and low personnel radiation exposures are generally well-managed overall." Nuclear Operations agrees and will use these and other performance indicators to measure the progress of the Plan. In general, supervisors and managers at various levels in the organization will track progress and performance within their areas of responsibility using the typical INPO performance indicators.

Ten indicators will be tracked and progress will be reviewed on a monthly basis as part of the NOIP. In addition to these performance indicators, each action identified in the Plan has a specific due date associated with it. Progress in meeting these due dates will be reviewed monthly. As the trend of any of the ten NOIP measures indicates that the desired performance levels have been achieved, senior management will determine whether a specific measure should be removed from the monthly NOIP review. Although such measures might no longer receive the focused attention of senior management, through the NOIP review, they would nevertheless continue to receive normal manager and supervisor reviews. If any of these reviews indicate trends toward undesirable performance, prompt and appropriate action would be taken to respond to those trends. Such action might include modifications to the Plan to ensure that the appropriate management attention is focused on the problem area.

In addition to the development of the Nuclear Operations Improvement Plan, a number of other improvements have been implemented since the submittal of our January 29, 1986 letter. Some of these improvements include:

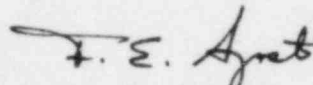
- o Appointment of an experienced individual as Group Vice President of Nuclear Operations; (Mr. B. Ralph Sylvia)
- o Assignment of a nuclear industry-experienced individual to advise the Vice President - Nuclear Operations;
- o Implementation of the Nuclear Security Improvement Plan;
- o Organizational and management changes within Nuclear Engineering to assure more effective support of Nuclear Production;
- o Organizational realignment within Nuclear Production so that the Rad/Chem Engineer reports directly to the Plant Manager;
- o Changing the Assistant Manager - Nuclear Production title to Plant Manager to strengthen the position in the organization;
- o Temporary relocation of the General Director, Nuclear Operations Services to the Plant Office Building to provide more effective day-to-day support of Nuclear Production;

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- o Continued monitoring of the performance indicators established for the Reactor Operations Improvement Plan;
- o Initiation of a search for nuclear industry-experienced individuals to fill management positions in Engineering and Security;
- o Involvement of the Fermi management team in the development of the Plan; and
- o Implementation of a series of two-day workshops for approximately ninety Fermi 2 managers and supervisors to increase their sensitivity and responsiveness to safety and regulatory issues.

Detroit Edison believes that these changes and the implementation of the Nuclear Operations Improvement Plan will result in further improvements in the management and overall performance of Fermi 2. The Company is committed to ensuring that such improvements occur.

Sincerely,



F. E. Agosti

cc: Mr. M. David Lynch
Mr. G. C. Wright
Fermi 2 Resident Inspector
USNRC Document Control Desk
Washington, D. C. 20555

Enclosure