

NOTICE OF VIOLATION

Detroit Edison Company
Enrico Fermi, Unit 2 Facility

Docket No. 50-341
License No. NPF-43

During an NRC inspection conducted January 11 - 29, 1999, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion III, "Design Control," states in part, "...The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculation methods, or by the performance of a suitable testing program. ...Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design."

Contrary to the above;

- A. As of January of 1999, Calculation DC-0367, "Design Calculations for RHR System," Revision L, dated February 13, 1996, incorrectly concluded that the addition of a new low pressure coolant injection (LPCI)/residual heat removal (RHR) cross-tie header block valve would result in a LPCI/RHR pump head requirement of less than 86 percent of the available pump capacity at a calculated flow of 13,000 gallons per minute (gpm) per pump under post-accident conditions. The calculation failed to include all applicable inputs. The calculated LPCI/RHR pump head requirement including these inputs was approximately 104 percent of the available pump capacity at the calculated flow of 13,000 gpm per pump.
- B. As of January of 1999, Calculation DC-0230, "Core Spray System," Revision F, addressed the test, post-accident, and run-out flow conditions of the core spray (CS) system. This calculation sized a flow restriction orifice to prevent the specified maximum system flow from being exceeded during run-out conditions, and calculated the post-accident CS system flows based on this orifice being installed in the system. However, the orifice data included in calculation DC-0230 was not correct; this flow restriction orifice had been resized during pre-operational testing. Due to the correction of the orifice size, the margin between the calculated test pressure acceptance criterion and the Technical Specification 4.5.1.b.1 value was reduced from approximately 8.5 psi to 0.1 psi.
- C. As of January of 1999, Calculation DC-0885, "ECCS Suction Line Air Ingestion," Revision B, determined the submergence at which air could potentially be entrained in the emergency core cooling system (ECCS) suction lines from the suppression pool. Modification EDP-29024 replaced the ECCS suction strainers with larger strainers. Neither the calculation or the modification addressed the minimum suppression pool water level allowed by Technical Specification 3.5.3.b during operational conditions 4 and 5. The ECCS suction strainers installed by engineering design package (EDP) -29024 would be partially uncovered with the minimum suppression pool level during mode 4 and 5 operations.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, the Detroit Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 8th day of March 1999