

B. Ralph Sylvia  
Group Vice President

Detroit  
Edison

6400 North Dixie Highway  
Newport, Michigan 48166  
(313) 586-4150

November 13, 1987  
NRC-87-0243

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

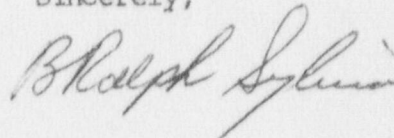
- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) IE Inspection Report No. 50-341/87028  
dated October 16, 1987
  - 3) Detroit Edison letter NRC-87-0081,  
dated June 12, 1987
  - 4) Detroit Edison letter NRC-87-0176,  
dated October 1, 1987

Subject: Response to Notice of Violation 50-341/87028

Reference 2 identified violations related to the Fermi 2 Quality Assurance and Preventive Maintenance programs. Detroit Edison's response is attached.

We trust this letter satisfactorily responds to your concerns. Please contact Mr. Lewis Bregni at (313) 586-4072 if you have any further questions.

Sincerely,



Enclosure

cc: Mr. A. B. Davis  
Mr. E. G. Greenman  
Mr. W. G. Rogers  
Mr. J. J. Stefano  
USNRC Region III

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RESPONSE TO NOTICE OF VIOLATION 50-341/87028

Statement of Violation

Fermi 2 Technical Specification, Section 6.8.1, requires that procedures for preventive maintenance, which can affect the performance of safety-related equipment be established, implemented, and maintained. Additionally, Fermi 2 Technical Specification, Section 6.8.4, requires that programs including preventive maintenance, be established, implemented, and maintained to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident.

Contrary to the above, the licensee failed to implement, or implement on schedule, the preventive maintenance program for a significant number of components (more than 5,000), including those associated with residual heat removal (RHR), high pressure coolant injection (HPCI), reactor core isolation cooling (RCIC), and emergency core cooling water (ECCW) systems.

This is a Severity Level IV violation (87028-01).

Corrective Actions Taken and Results Achieved

The cover letter to Reference 2 requested that Detroit Edison evaluate the effect that never-performed and past due Preventive Maintenance items have on the reliability and operability of the affected systems, to reassess the priorities assigned to the PM items and to provide plans to implement a program to reduce the Preventive Maintenance backlog to an acceptable level. In response to these concerns, a task force was developed and a review of the PM tasks for safety significance was conducted. The PM tasks were assigned priorities (A or B) depending on their safety significance. The safety-significant PM activities (Priority A) that had not been previously completed within the PM Program were identified. A review of equipment history was next performed to determine whether the PM activity had been satisfied during the performance of other maintenance activities. This resulted in the identification of 757 Priority A PM items that had not been previously completed either through the PM Program or through other maintenance tasks. These 757 Priority A PM activities were then evaluated to determine when each activity was required to be completed. Eighty-eight (88) activities were identified as being required to be completed prior to plant restart. These were issued

and completed during the 87-06 outage in July/August, 1987. An evaluation of the remaining non-completed Priority A activities was then performed to ensure that deferral of each activity would not impact the reliability and operability of the affected system.

206 of the original 757 non-completed Priority A activities have now been completed. This includes the 88 non-deferrable activities completed during the 87-06 outage. The remaining 551 activities will be completed as schedule allows, but no later than prior to startup following the LLRT outage.

#### Corrective Actions to be Taken to Avoid Further Violations

To ensure that safety significant Preventive Maintenance (PM) activities are completed on schedule in the future, the PM Procedure (12.000.17) is being revised to require Priority A PM's not completed in the month they are scheduled, to be identified and evaluated. If postponement of the PM cannot be justified, then a Deviation Event Report (DER) will be written to document the missed PM and to obtain formal Engineering evaluation of the situation. A report will be issued monthly to the Superintendent - Maintenance & Modifications identifying the Priority A PM activities that were not completed. This report will identify the piece of equipment, a description of the PM task to be performed, the safety significance of not performing the activity, the new scheduled completion date and the justification for the schedule.

#### Date of Full Compliance

Procedure 12.000.17 will be revised by December 1, 1987. The remaining 551 Priority A PM activities discussed above will be completed prior to startup following the LLRT outage, which is presently scheduled for March, 1988.



Statement of Violation

10CFR50, Appendix B, Criterion II, as implemented by Detroit Edison Company Operational Quality Assurance Policy 2, "Quality Assurance Program," requires that the Quality Assurance Program shall provide control over activities affecting the quality of the identified structures, systems, and components, to the extent consistent with their importance to safety, and requires that activities affecting quality shall be accomplished under suitably controlled conditions, including assurance that all prerequisites for the given activity have been satisfied.

Contrary to the above, the licensee failed to identify the FDG 13 fuel oil day tank level indicators as safety-related and TS related on WR No. 648693, which resulted in work instructions being prepared, work being performed and closed out as if the components were non safety-related and non TS related and the licensee failed to provide adequate controls consistent with the components importance to safety.

This is a Severity Level V violation (87028-04)

Detroit Edison's Position and Actions

Detroit Edison does not necessarily agree with the violation as written. Specifically, Detroit Edison does not agree with the implication that all Technical Specification-related equipment should be classified as safety-related. The "important to safety" issue has a long history and is one that has not yet been resolved. This violation involves a level indicator that is used to verify a level of at least 210 gallons of fuel in the Emergency Diesel Generator Day Tank on a daily basis. The indicator serves no active safety-related purpose and its failure would not preclude proper operation of the Emergency Diesel Generator. The level of fuel in the day tank is the important element; the level indicator merely provides a method of determining this level. Should the level indicator not be operable, alternate methods of determining level in the day tank would be acceptable. The Technical Specification simply requires a certain level to be verified on a daily basis with no reference to a level indicator, a level measuring rod or other measuring device.

Detroit Edison agrees that instrumentation used to fulfill Technical Specification requirements must be accurate and reliable and has been evaluating methods to ensure that this instrumentation is maintained in a satisfactory manner. The tentative plan is to identify the instrumentation used to fulfill Technical Specification requirements, and to classify and maintain it as Quality level 1M. Replacement

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parts will meet the same criteria as that originally specified and/or purchased and installed.

Detroit Edison will complete its evaluation of this tentative plan by December 31, 1987 and will keep the NRC resident inspector informed as this evaluation progresses. Presently, the I&C Surveillance Procedures Improvement Program described in Reference 3, and the detailed technical review of Technical Specification surveillance requirements described in Reference 4 are underway and will provide a list of Technical Specification-related instruments as described above. An update of this response along with specific completion dates will be provided by December 31, 1987.

Statement of Violation

10CFR50, Appendix B, Criterion XVIII, as implemented by Detroit Edison Company Operational Quality Assurance Policy 18, "Audits," requires that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program, and requires that audits shall be performed in accordance with written procedures or checklists.

Contrary to the above, the licensee's auditors and audits failed to identify the preventive maintenance issue noted in Violation 341/87028-01 and failed to complete checklists, including the checklist item on material storage protection level, which resulted in failure of the licensee to: verify compliance with all aspects of the QA Program; adequately determine the effectiveness of the QA Program; and identify a significant condition adverse to quality.

This is a Severity Level IV violation (87028-08).

Corrective Actions Taken and Results Achieved

The Audit Program implementing procedure, NQAP 1801, was revised during the inspection in July 1987 to require the Audit Team Leader (ATL) to assign priorities (high or low) to each checklist item prior to checklist approval. High priority items are required to be completed during the audit. The ATL is also required to review the checklist following the audit to verify that all checklist items have been accounted for and justification has been provided for checklist items not completed. NQAP 1801 now also provides guidance concerning acceptable annotation of checklist items.

Training sessions were held with all ATL's to review the revised procedure. Training was completed on August 28, 1987. In addition to communicating the changes described above, these training sessions were used to reemphasize the importance of maintaining a global perspective and focusing audits on performance and results of activities being audited.

In addition to the above, the supervisor for the audit function, is reviewing the audit checklist prior to the audit to assure that emphasis is on product and results and that the checklist identifies high priority items. Periodically, the audit supervisor and QA management will spend time in the field monitoring audits in progress to assure themselves that their expectations with reference to performance are being met and to provide appropriate feedback to the auditors, including coaching where necessary (current QA Program



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requirements stipulate that the supervisor and his manager review and approve the completed audit reports).

Corrective Actions To Be Taken to Avoid Further Violations

The corrective actions described above have been taken to prevent further violations.

Date of Full Compliance

Procedure changes and training identified above have been completed. Actions associated with overview of audits described in the last paragraph, above, have been initiated and will continue until QA management is satisfied that the audits are being performed to produce a results and product perspective.

Statement of Violation

Fermi 2 Technical Specification, Section 6.5.2.8 requires that audits of unit activities be performed within specified frequencies.

Contrary to the above:

- a. Audits of unit activities, such as operations, corrective action, and fire protection were not performed within specified frequencies. (341/87028-09A).

This is a Severity Level V violation (87028-02).

Corrective Actions Taken and Results Achieved

Prior to the inspection several audits originally scheduled for 1988 had been rescheduled to bring them in line with their initial frequency (e.g., Fire Protection moved from January 1988, to December 1987 and Corrective Action from February and August 1988 to January and July 1988.)

Corrective Actions To Be Taken to Avoid Further Violations

Audit schedules are issued at the beginning of the year and updated quarterly. The yearly schedule provides a two year look ahead. Beginning with the 1988-1989 schedule, Detroit Edison will not only identify the audit completion date and required frequency but will also indicate when the previous audit was performed. This will enable the Reviewer and Approvers to assure themselves that Fermi 2 is meeting the applicable frequency requirements. We believe this level of management overview will assure Technical Specification Compliance.

Date of Full Compliance

Full compliance will be achieved by January 1, 1988.