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June 21, 1989 NRC-89-0147

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

Reference:

- (1) Fermi 2 NRC Docket No. 50-341 NRC License No. NPF-43
- (2) Detroit Edison letter, NRC-88-0159, dated July 28, 1988
- (3) Notice of Violations (NRC Inspection Report No. 50-341/88018) dated June 28, 1988
- (4) Detroit Edison letter, NRC-89-0094, dated April 28, 1989

Subject: Revised Response to a Notice of Violation

The response to Violation 88018-03 was contained in Reference 2. This violation concerned outdated information contained in I&C equipment history files. The response discussed that Technical Specification instrumentation was being calibrated using I&C surveillance procedures rather than information from the history files. While the setpoints and acceptance criteria for the remaining instrumentation would still be obtained from the equipment history folders, the I&C foreman would verify the information on the specification sheets prior to use in the field until the history folders are reviewed and upgraded as necessary. A schedule for the review of the history folders was established. The Technical Specification and QA Level I instrument history files were to be done by June 30, 1989 and the balance of plant folders were expected to be completed by December 31, 1989.

In recent months the scope of the work has changed and hence the schedule. The need for the schedule change has been verbally communicated to NRC representatives. This letter serves to confirm the change, describe the new scope and establish the revised schedule.

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In Reference 4, the response to the SALP 10 report, Detroit Edison described a preventive maintenance (PM) improvement program which was underway for electrical and mechanical PM tasks. The SALP response stated that future phases would include all remaining Category A & B PM tasks.

The majority of I&C tasks in the current PM program are instrument calibrations. Review of each instrument's PM tasks involves use of the equipment history folders. Therefore, an I&C calibration review program has been integrated into the review of the history folders. As the instruments are reviewed, calibrations are being integrated on an instrumentation loop besis, rather than each instrument in the loop having an individual PM task assigned. This integration will result in more efficient performance of calibrations and less cumulative out-of-service time.

For Technical Specification required instrumentation, both the review of equipment history folders and calibration evaluations will be completed by June 30, 1989. Both review projects will be completed for remaining QA Level 1 and QA Level 1M instruments by November, 1989. QA Level 1M instruments are mainly those that are not safety-related, but are required by Technical Specifications or are used to perform Technical Specification required surveillances. The reviews of I&C history folders and instrument calibrations for balance of plant instruments are currently expected to be finished by the end of 1990.

If you have any questions, please contact Lynne Goodman at (313) 586-4211.

Sincerely, Ulllur

cc: A. B. Davis

R. C. Knop

W. G. Rogers

J. F. Stang

Region III