

MAR 21 1989

Docket No. 50-341

The Detroit Edison Company
ATTN: B. Ralph Sylvia
Senior Vice President
Nuclear Operations
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

Thank you for your letter dated February 24, 1989, informing us of the steps you have taken to correct the violations at the Fermi 2 facility, which we brought to your attention in our letter dated January 24, 1989.

After reviewing your response, we noted that you denied Part B of Violation 88031-01. During a telephone conversation on March 16, 1989, between Mr. N. Choules of our staff, and Mr. T. Riley and Ms. P. Anthony of your staff, we learned that the QC inspector had obtained approval from your engineering staff prior to accepting the installed fuses. Based on the additional information, we withdraw Part B of Violation 88031-01.

However, since the basis for accepting the fuses was not documented on the work request, as discussed in our report, and with Mr. T. Riley on March 20, 1989, it was agreed that you would address the steps you have taken to assure that potential conditions adverse to quality and their resolutions would be documented by QC personnel. Mr. Riley stated that this information would be formally addressed and a response prepared by April 20, 1989.

We will gladly discuss any questions you have concerning this matter.

Sincerely,

R. W. Cooper, II for
R. W. Cooper, II, Chief
Engineering Branch

cc: Patricia Anthony, Licensing
P. A. Marquardt, Corporate
Legal Department

cc w/ltr dtd 02/24/89:
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
Harry H. Voight, Esq.
Michigan Department of
Public Health
Monroe County Office of
Civil Preparedness

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B. Ralph Sylvia
Senior Vice President

**Detroit
Edison**

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

February 24, 1989
NRC-89-0020

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

- References: (1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- (2) Notice of Violation, NRC Inspection Report
50-341/88031 dated January 24, 1989
- (3) Detroit Edison response to SALP Report,
NRC-88-0198, dated August 17, 1988

Subject: Response to Notice of Violation

Attached is the response to reference 2. The violation was issued for activities and conditions found during preventive maintenance on the 130V battery chargers between November 1987 and November 1988. In response to Violation 88031-01B, regarding a QA inspectors' identification that fuses installed in 130 Volt battery charger 2B-2 were not as specified in As-Built Notice 5848-1, DECo has determined that appropriate information had been previously prepared by engineering which indicated a non-conforming condition, i.e., one requiring the issuance of a Deviation Event Report, did not exist. As a result, DECo denies this portion of the violation.

If there are any questions relating to this response, please contact Patricia Anthony at (313) 586-1617. Mr. R. Knop, NRC RIII, authorized a one day extension for this response in a telecon with Ms. L. Goodman on February 23, 1989.

Sincerely,

B. Ralph Sylvia

cc: A. B. Davis
R. C. Knop
W. G. Rogers
J. Y. Stang
Region III

8902000291 SPF 3-6-89

RESPONSE TO NOTICE OF VIOLATION 50-341/88031

Statement of Violation 50-341/88031-01A:

In the Notice of Violation it stated:

The preventive maintenance instructions for the 130 Volt battery chargers, including WRs P026307, P026308 and several other WRs for battery chargers work performed in November 1987, May 1988, and November 1988 did not contain acceptance criteria for determining the proper size and type fuses installed in the 130 volt battery chargers.

Discussion:

Originally, the 130 volt battery chargers were supplied and qualified by the vendor with Brush SF 13x150 internal fuses. In March 1988, Detroit Edison Engineering Research Department tested a sample size of 4 from a lot of 50 fuses for upgrade to QA-1 applications. One of the four sampled failed the let-through current test only. Comparison of test results to vendor curves indicated that the one fuse allowed a let-through current that exceeded the manufacturer's value by more than 30%. This and the fact that the vendor recommended a Shawmut replacement fuse led engineering to determine that it was preferable to stock Gould Shawmut A13x150-4 AMP Trap Form 101 fuses.

The vendor replacement parts list specified Shawmut, Form 101, 150 Amp fuses. The Vendor Manual, prior to November 1987, did not contain this list of replacement parts. However, As-Built Notice (ABN) 5848-1 was then issued in November 1987 to attach this spare parts list to the Vendor Manual. The intent was to continue using the installed Brush fuses unless they failed and required replacement. Replacements would then be from Gould Shawmut. The field configuration was in accordance with that originally supplied by the vendor.

It should be noted that the vendor had installed and qualified both types of fuses. Therefore, no condition adverse to quality existed in that at no time were non-qualified fuses installed in the 130V D.C. QA-1 Battery Chargers.

Corrective Actions Taken and Results Achieved:

To eliminate confusion as to the proper fuse to be utilized in the battery chargers, in November of 1988 the fuses were replaced with the Shawmut design.

Corrective Actions to Be Taken to Prevent Recurrence:

For tasks that are completed by using procedures, the Fermi 2 Writers Guide requires that acceptance criteria be designated

RESPONSE TO NOTICE OF VIOLATION 50-341/88031

Corrective Actions to Be Taken to Prevent Recurrence (cont'):

where necessary. Additionally, NPP-PS1-01, "Planning of Maintenance Activities", which was prepared during the recent Procedures Upgrade Effort, requires that acceptance criteria be included in the work instruction for those tasks not being accomplished by a procedure.

As a followup action to strengthen the program, NPP-MA1-02, "Preventive Maintenance Program" will be revised to explicitly require that acceptance criteria be specified, where appropriate, for preventive maintenance activities not being performed using a procedure.

Also, a memorandum will be issued by March 31, 1989 as required reading for all maintenance planning and support personnel reiterating the necessity for providing acceptance criteria in maintenance work instructions.

Date When Full Compliance Will Be Achieved:

The revision to NPP-MA1-02 will be completed by April 30, 1989.

RESPONSE TO NOTICE OF VIOLATION 50-341/88031

Statement of Violation 50-341/88031-01B:

In the Notice of Violation, it stated:

When a Production Quality Assurance (PQA) inspector identified on November 16, 1987, that fuses installed in 130 volt battery charger 2B-2 were not as specified in As-Built Notice ABN 5848-1, a Deviation Event Report (DER) was not issued as required by procedure POM 12.000.52, "Deviation and Corrective Action Reporting," Revision 3. As a result, no action was taken to resolve the fuse size and type discrepancy.

Discussion:

The subject of the fuses in the safety-related Battery Chargers was first brought up to Nuclear Engineering (NE) in June 1986. Following an evaluation, Preliminary Design Change (PDC), PDC-5848, Rev. 0, was issued by NE in December 1986. The PDC stated that the fuses installed (i.e., the Brush SF 13x150 internal fuses) were supplied by the vendor. Also, the PDC noted that replacement fuses should be classified QA-1 and that since these fuses are not distributional type fuses normally pulled by plant operations (i.e., they are internal or "instrument" type fuses), they need not be listed in engineering specification 3071-128-EJ. As such, the proper source document for replacements is the vendor manual. As noted above in the response to part A of this violation, the vendor manual, at that time, did not contain a list of vendor recommended replacement parts. Therefore, ABN 5848-1 was issued to include the vendor recommended replacement fuses in the vendor manual (Shawmut, Form 101, 150 Amp fuses were the vendor specified replacement part).

Several important factors should be noted regarding the nature of the work packages and the status of equipment involved in this potential violation. The work packages did not involve replacement of the battery charger internal fuses. Only a check to verify proper size and type of fuse installed was specified. When the QC inspector went to verify the correct fuse was installed, it was noted that the fuses installed were not the same as the replacement fuses specified by ABN 5848-1. In resolving this question before the inspector could sign-off on the QC hold point, several factors were considered. In relation to correct fuse "size", both the Shawmut and the Brush fuses are rated at 150 Amp; i.e., either is dimensionally correct. To verify the correct "type" of fuses, it should be noted that both are identical, i.e., semi-conductor fuses; only the manufacturer differed. Therefore, these fuses are considered like-for-like fuses. In addition as was previously documented in PDC-5848, the

RESPONSE TO NOTICE OF VIOLATION 50-341/88031

Discussion (cont'):

installed fuses were supplied by the battery charger vendor as original equipment. Based on this information and considering the fact that replacement of these fuses was not required, the QC inspector signed-off on the QC hold point involved. Based on the above considerations, a DER was not needed since a non-conforming condition did not exist on these fuses; i.e., there was no condition adverse to quality for the safety-related battery chargers.

When the same question of proper fuse type and size arose again in the performance of later work packages (i.e., in November 1988), Production Quality Assurance wrote DER 88-1977 to eliminate the question permanently. Again, it should be noted that the work package did not require replacement of these fuses. However, as a result of this recurring question, Nuclear Engineering recommended in the resolution of this DER that the Brush fuses be removed and replaced per ABN 5848-1. This action was completed on November 18, 1988.

Accordingly, DECo denies Part B of Violation 88-031-01.