Commonwealth Edison Company
Dresden Generating Station
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10 CFR 50.73

ComEd

July 28, 2000

PSLTR: #00-0108

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dresden Nuclear Power Station, Unit 2
Facility Operating License No. DPR-19
NRC Docket No. 50-237

Subject: Licensee Event Report 2000-003-00, "Technical Specification Non-Compliance due to Untimely Submittal of an ASME Code Relief Request"

The enclosed Licensee Event Report, which is a final report, describes the Technical Specification non-compliance due to untimely submittal of an ASME Code Relief Request for snubber visual inspection intervals and corrective actions. This condition is being reported pursuant to 10 CFR 50.73 (a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

The following action was taken:

Dresden Nuclear Power Station submitted to the NRC, both interim and permanent relief requests.

This correspondence contains the following commitment:

Dresden Nuclear Power Station will upgrade the snubber program. Elements of this upgrade include: Assemble and review the pertinent regulatory and ASME Code Section XI requirements, all implementing procedures, and predefines for the snubber program. A process for periodic review, and update of the technical requirements will be put in place. The snubber program owner level of knowledge will be assessed and upgraded, as required.

IE22

If you have any questions, please contact Dale Ambler, Dresden Regulatory Assurance Manager at (815) 942-2920 extension, 3800.

Respectfully,

7/28/00
STATION MGR FOR SVP

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Enclosure

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED BY OMB NO. 3150-0104
EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the information and Records Management Branch (t-6 f33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office Of Management And Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)
Technical Specification Non Compliance due to Untimely Submittal of an ASME Code Relief Request

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									N/A	N/A
06	29	2000	2000	003	00	07	28	2000	FACILITY NAME N/A	DOCKET NUMBER N/A

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more) (11)							
POWER LEVEL (10)	100		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(i)		20.2203(a)(3)(l)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i))		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Timothy P. Heisterman, Regulatory Assurance	(815) 942-2920 Ext. 3324

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO				

ABSTRACT (Limit to 1400 spaces, i. e., approximately 15 single-spaced typewritten lines) (16)

On June 28, 2000, at 1800 hours, during a review of the Inservice Inspection Program, it was identified that the snubber visual inspection requirements per Technical Specification (TS) Section 4.0.E were not being met.

TS 4.0.E states in part:

"Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

1. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g) and 50.55a(f), respectively, except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(f)(6)(i), respectively.

TS surveillances were being performed in accordance with the alternative requirements described in TS 4.8.F, without obtaining a written relief for exceptions to the ASME Code requirements. TS 4.8.F allowed Dresden Nuclear Power Station to increase the snubber surveillance frequencies for up to forty-eight months as opposed to the ASME Code requirement of eighteen months. These surveillance requirements were implemented following the Technical Specification Upgrade Project (TSUP) in 1996.

The cause of this event has been determined to be programmatic weaknesses in the snubber program that resulted in a failure to recognize the conflicting regulatory information and ASME Code requirements for the snubber inspection surveillance requirements.

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 MWt rated core thermal power

Energy Industry Identification System (EIIS) Codes are identified in the text as [XX] and are obtained from IEEE Standard 805-1984, IEEE Recommended Practice for System Identification in Nuclear Power Plants and Related Facilities.

EVENT IDENTIFICATION:

Technical Specification Non Compliance due to Untimely Submittal of an ASME Code Relief Request

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2 Event Date: 06-28-2000 Event Time: 18:00
Reactor Mode: 1 Mode Name: Run Power Level: 100
Reactor Coolant System Pressure: 1002 psig

B. DESCRIPTION OF EVENT:

This LER is being submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications (TS).

On June 28, 2000, during a review of the Inservice Inspection (ISI) Program, it was identified that snubber surveillances were not being performed in accordance with the American Society for Mechanical Engineers (ASME) Code requirements mandated by TS 4.0.E. TS snubber Surveillance Requirements (SR) were being performed per TS 4.8.F, which requires that each snubber be determined OPERABLE by the performance of an augmented inservice inspection program and allows inservice inspections to be performed up to a 48 month interval. TS 4.0.E requires inservice inspection of ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with appropriate version of Section XI of the ASME Boiler and Pressure Vessel (BP&V) Code and Addenda which specifies an 18 month interval.

During the Technical Specification Upgrade Project (TSUP), implemented in 1996, TS 4.8.F was revised to the inspection requirements of Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Action." This allowed the frequency of visual inspection to be increased to a maximum of 48 months. TS 4.0.E required inspections to be performed at the ASME Code frequency of 18 months, but this requirement was not recognized and no relief request was submitted. All Snubber Visual Inspection requirements were met prior to TSUP as both TS Sections gave a maximum of 18 months for the visual inspection frequency.

On August 8, 1996, all snubber surveillance requirements at this time were revised to meet the new requirements of TS 4.8.F.

In the interim period from August 8, 1996 to June 28, 2000 there were several opportunities, during self assessment and ISI program reviews, to identify this issue and submit a ASME Code relief request. However, the need for a relief request was never entered into the corrective actions program.

No other systems, components or structures were identified which contributed to this event.

C. CAUSE OF EVENT:

The investigation revealed that the root cause is a weakness in the snubber program that resulted in a failure to recognize code requirements for snubber inspection frequencies. The weaknesses in the snubber program caused the TS and ASME Code differences to originally go uncorrected during the TSUP and predefine revisions. There were further opportunities since 1996 (self-assessments and ISI updates) to identify this issue prior to violating the more conservative 18-month criteria but did not occur due to program weaknesses. (NRC Cause Code E).

Contributing causes to this event include failure to enter the need for a relief request into the formal corrective action process and the failure of the predefine revision process to adequately identify all the applicable inspection requirements upon the extension of the snubber frequency.

D. SAFETY ANALYSIS

This event involved a TS requirement not being performed in a timely manner The current TS 4.8.F follow the guidelines as set forth in GL 90-09, allowing inspection frequency of up to 48 months based on successful visual inspections of the snubbers. The previous visual examinations of the snubbers were found to be acceptable and there is no indication of any potential failures resulting from the previous examinations. Based on this, the health and safety of the public were not compromised at any time during this condition. There was no safety system functional failure associated with this event. Thus, the safety significance of this condition is minimal.

E. CORRECTIVE ACTIONS:

Dresden Nuclear Power Station submitted to the NRC, both interim and permanent relief requests. (Complete)

Since 1999, Engineering management has clearly identified the standards for identification of issues via the corrective action process. These expectations have been continually reinforced through tailgate meetings and continuing training sessions. Accountability has been consistently administered when these standards have not been met.(Complete)

Assemble and review the pertinent regulatory and ASME Code Section XI requirements, all implementing procedures, and predefines for the snubber program. A process for periodic review, and update of the technical requirements will be put in place. The snubber program owner level of knowledge will be assessed and upgraded, as required. (ATI # 31212-06)

F. PREVIOUS OCCURRENCES:

None.

G. COMPONENT FAILURE DATA:

N/A