Exelon Generation Company, LLC Dresden Nuclear Power Station 6500 North Dresden Road Morris, IL 60450-9765

www.exeloncorp.com

10 CFR 50.73

Exelo

Nuclear

SVPLTR # 08-0013

March 17, 2008

U. S. Nuclear Regulatory Commission **ATTN: Document Control Desk** Washington, DC 20555-0001

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

Subject: Licensee Event Report 237/2008-001-00, "Procedure Adherence Issue Results in Violation of Technical Specification"

Enclosed is Licensee Event Report 237/2008-001-00, "Procedure Adherence Issue Results in Violation of Technical Specification," for Dresden Nuclear Power Station Unit 2. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications." There are no regulatory commitments contained in this submittal.

Should you have any questions concerning this report, please contact Mr. James Ellis, Regulatory Assurance Manager, at (815) 416-2800.

Respectfully,

in B Wozmik

David B. Wozniak Site Vice President **Dresden Nuclear Power Station**

Enclosure

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

LE22 NRR

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burde estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 2055-0001, or by interme e-mail to infocollects@nic.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management an Budget, Washington, DC 20053. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC ma	NRC FO	RM 366			U.S. M	NUCLEAR R	EGULATO	RY COMMI	SSION	APPRO\	ED BY OMB	: NO. 315	50-0104	1	EXPIRE	5: 08/31/2010
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LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER 3. PAGE						
Dresden Nuclear Power Station, Unit 2	05000237	YEAR	SEQUENTIAL NUMBER	REV NO.	2	OF	4	
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NARRATIVE

Dresden Nuclear Power Station (DNPS) Unit 2 is a General Electric Company Boiling Water Reactors with a licensed maximum power level of 2957 megawatts thermal.

A. <u>Plant Conditions Prior to Event</u>:

Unit: 02 Event Date: 11-19-2007 Reactor Mode: 2 Mode Name: Startup Reactor Coolant System Pressure: Approximately 900 psig

Power Level: 10 percent

U.S. NUCLEAR REGULATORY COMMISSION

B. <u>Description of Event</u>:

On January 15, 2008, a DNPS Qualified Nuclear Engineer was performing mentoring with a reactor engineering trainee on control rod sequencing and discussing the reference documents used to prepare a sequence. One of the required reference documents identified was the results from the control rod drop accident analysis. As part of the discussion, the DNPS Unit 2 Cycle 21 and Unit 3 Cycle 20 cycle-specific control rod drop accident analyses were reviewed. During this review it was identified that the control rod sequence used for startup of Unit 2 following the refueling outage in November 2007 did not comply with the control rod drop accident analysis. The control rod pull order used in the analysis did not match the order used for the Unit 2 startup sequence. The analysis used control rod group pull sequence 3-4-1-2-<u>7-8</u>-10-9 while the Unit 2 conditions on November 19, 2007, identified that for approximately 5 1/2 hours the unit did not comply with the requirements of Technical Specification 3.1.6, "Rod Pattern Control."

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications."

C. <u>Cause of Event</u>:

The Root Cause of this event was human performance and was attributed to failure of Dresden Nuclear Power Station personnel to follow procedures due to a lack of understanding of the requirements for using a Level 2 procedure and the qualified individual incorrectly assumed that the "Level 2 – Reference Use" procedures did not need to be reviewed in detail during preparation of the sequence.

The evaluation of this event identified the following:

- The need for developing a control rod group pull sequence for the startup of DNPS Unit 2 following the November 2007 refuel outage was identified and scheduled to allow adequate time for the preparation, review and approval of the sequence.
- An adequate pre-job brief was conducted with all individuals involved in the preparation, review and approval of the sequence. The pre-job brief identified the procedures required for the activity including NF-AB-720, "Control Rod Sequence Package Preparation, Review, Revision and Implementation," Revision 2, and NF-DR-721, "Control Rod Sequences and

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NARRATIVE	<u></u>	L			
conclu • • The c assoc A revi	Forms," Revision 3. Both proc procedure HU-AA-104-101, Re "Level 2 – Reference Use" as performance of an activity to c performed, performing each st appropriate blocks to certify th at the work location. Also, HU performed for "Level 1 – Conti sequence unless otherwise sp No procedural inadequacies w startup sequence that complie number of references to the co "Analyzed Rod Sequence" in N defined as the order of rod wit control rod drop accident analy approved methodology. The evaluation did identify that group pull sequence was flawed did not follow procedural requi rod drop accident analysis. Dlowing statements provided by usion. A detailed review of the seque startup sequence, only selected knew how to perform the task understanding of 'reference us based on the individual's confit The sequencing procedures w sequence. The independent r accident analysis. orrective action to prevent recur- iated with this event. ew of the control rod group pull e in November 2006 did not iden	evision 1, "Pro a procedure re confirm that all tep in the sequ- at all segment I-AA-104-101 s nuous Use" ar becified within the vere identified is with the com- ontrol rod drop NF-AB-720 and hdrawal or ins ysis requirements to de DNPS person encing procedu- rocedures bein encing procedu- rocedures bein encing procedu- encing procedu- encing procedu- encing procedu- encing procedu- idence in their vere reviewed as the same as rence of this en- sequence for the same as	cedure Use a equiring period procedure se ence specifies s are complected Step 4.3.2 stand "Level 2 – the procedure that would pre- trol rod drop accident and d NF-DR-721 ention that has entis below the on and indep e sequence of velop a sequence velop a sequence of velop a sequence of	and Adherence," de polic referencing du egments of an active ed and, where requ eted. The procedur ates that all numbe Reference Use" pre e or work order. revent an individual accident analysis a alysis through use 1. Analyzed Rod S as been analyzed to e Low Power Setpo bendent review of th developed by the D ence that complies ed with this event of performed when pre e Use – Level 2. performed when pre because the individ ference use'. The one of the procedu form the task. dependent review of assumed that the c he individual knew counsel and coach	efines the term ring the vity have been uired, signing re is required to be ered steps are rocedures in I from developing a as there are a of the term equence is o conform to bint utilizing a NRC the control rod NPS personnel s with the control confirmed this reparing the tual believed they individual's ure is reviewed of the startup ontrol rod drop what was in the the individuals

NRC FORM 366A (9-2007) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET

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NARRATIVE

D. <u>Safety Analysis</u>:

The safety significance of the events is minimal. A vendor analysis of the control rod group pull sequence used on November 19, 2007 for Unit 2 startup confirmed that the control rod drop accident analysis was met. Therefore, the consequences of the events had minimal impact on the health and safety of the public and reactor safety.

E. <u>Corrective Actions</u>:

The corrective action to prevent recurrence of this event was to counsel and coach the individuals associated with this event.

The requirements for the use of a "Level 2-Reference Use" procedure as specified in procedure HU-AA-104-101 was discussed with the individuals involved in this event.

A sample of documents prepared by DNPS reactor engineering personnel to a "Level 2-Reference Use" procedure will be reviewed for procedure compliance.

F. <u>Previous Occurrences</u>:

A review of DNPS LERs for the last three years did not identify any LERs associated with human performance that was attributed to failure of DNPS personnel to follow procedures due to a lack of understanding of the requirements for using a Level 2 procedure or assuming that the "Level 2 – Reference Use" procedures did not need to be reviewed in detail during work.

G. <u>Component Failure Data:</u>

NA