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Dresden Nuclear Power Station
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10 CFR 50.73

SVPLTR # 11-0033

July 18, 2011

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

Dresden Nuclear Power Station, Unit 2 and Unit 3
Renewed Facility Operating License No. DPR-19 and DPR -25
NRC Docket No. 50-237 and 50-249

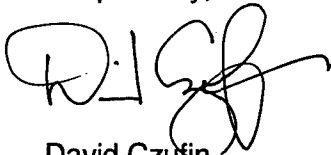
Subject: Licensee Event Report 237/2011-001-00, Loss of Containment Cooling
Service Water System due to Stop Log Installation

Enclosed is Licensee Event Report 237/2011-001-01, Loss of Containment Cooling Service Water System due to Stop Log Installation, which is a final report. This event is being reported in accordance with 10 CFR 50.73(a)(2)(v)(B), "Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat."

There are no regulatory commitments contained in this submittal.

Should you have any questions concerning this letter, please contact Mr. Dennis Leggett at (815) 416-2800.

Respectfully,



David Czufin
Site Vice President
Dresden Nuclear Power Station

Enclosure

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

JE22
MPL

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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 burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

1. FACILITY NAME Dresden Nuclear Power Station, Unit 2	2. DOCKET NUMBER 05000237	3. PAGE 1 OF 3
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4. TITLE
Loss of Containment Cooling Service Water System due to Stop Log Installation

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	17	2011	2011	001	00	07	18	2011	Dresden Unit 3	05000249
									FACILITY NAME	DOCKET NUMBER
									N/A	N/A

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)									
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER							
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A							

12. LICENSEE CONTACT FOR THIS LER

NAME Riley Ruffin – Regulatory Specialist	TELEPHONE NUMBER (Include Area Code) 815-416-2815
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR

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

On May 17, 2011, a quarterly preventative maintenance activity was planned to inspect and clean the safety related suction bay (Bay 13) in the plant's crib house. During the performance of the activity, maintenance personnel installed stop logs on both sides of Bay 13. In this configuration, the Containment Cooling Service Water (CCSW) system is rendered inoperable due to the limited capacity of water contained in the bay. Based on a subsequent investigation of the event, it was identified that a maintenance supervisor inappropriately had the work package revised to allow concurrent installation of both stop logs. Personnel involved did not recognize that this configuration would pose an adverse impact to the CCSW system.

Following discussions of the package revision with other maintenance supervisors, the job supervisor recognized that installation of both stop logs was an uncommon practice due to its potential for isolating water sources.

Operations personnel were notified of the configuration. Operations personnel entered the appropriate Technical Specification (TS) required actions for the system inoperabilities. The stop logs were removed from the 3A side of Bay 13 at approximately 1410 hours, which allowed the TS required actions to be exited. The CCSW system was inoperable for less than 4 hours. Since the probability of occurrence of a design basis accident was low in this case, the health and safety of the public were not compromised as a result of this condition.

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		2011	- 001	- 00	

NARRATIVE

PLANT AND SYSTEM IDENTIFICATION

Dresden Nuclear Power Station (DNPS) Unit 2 is a General Electric Company Boiling Water Reactor with a licensed maximum power level of 2957 megawatts thermal. The Energy Industry Identification System codes used in the text are identified as [XX].

A. Plant Conditions Prior to Event:

Unit: 02	Event Date: 05-17-2011	Event Time: 1030 hours CDT
Reactor Mode: 1	Mode Name: Power Operation	Power Level: 100 percent

B. Description of Event:

On May 17, 2011, plant personnel were preparing to perform a quarterly preventative maintenance (PM) activity. The work order provided instructions to inspect and clean the safety related suction bay (Bay 13) in the Dresden Crib House.

Prior to the performance of the PM, the maintenance first line supervisor (FLS) assigned to the PM reviewed the work instructions and concluded that since divers would enter the suction bay for the inspection and cleaning, the stop logs should be installed. The supervisor requested that maintenance planning revise the existing work instructions to include installation of the stop logs. The maintenance work planner added the requested steps, which allowed concurrent installation of both stop logs on both the 2C and 3A sides of Bay 13. Neither the maintenance supervisor nor work planner recognized that this configuration would pose an adverse impact to the Containment Cooling Service Water (CCSW) system [BI].

During the performance of the activity, maintenance personnel installed stop logs on both the 2C and 3A sides of Bay 13 in accordance with the revised work instructions. The stop logs were installed at approximately 1030 hours CDT. While in this configuration, the CCSW systems for both Units 2 and 3 were rendered inoperable due to the limited capacity of water contained in the bay.

The revised work instructions did not receive a thorough evaluation to ensure that the configuration did not result in an adverse system impact.

Subsequently, the FLS discussed the revision of the work instructions with other maintenance supervisors. Following the discussion, the FLS recognized that installation of both stop logs was an uncommon practice due to its potential for isolating water sources. Directions were given to remove the stop logs.

At approximately 1400 hours, operations personnel were notified of the configuration. Operations personnel entered required actions for technical specification (TS) 3.7.1, "Containment Cooling Service Water", TS 3.6.2.3, "Suppression Pool Cooling", TS 3.6.2.4, "Suppression Pool Spray", and TS 3.7.5, "Control Room Emergency Ventilation Air Conditioning System". The stop logs were removed from the 3A side of Bay 13 at approximately 1410 hours, which allowed the TS required actions to be exited. At approximately 1430 hours, stop logs were removed from the 2C side of Bay 13.

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NARRATIVE

The CCSW system was inoperable for less than 4 hours. Even though the plant's TS allow both subsystems to be inoperable for a specified period of time, the condition results in a loss of function for the CCSW system. Therefore this condition is reportable pursuant to 10 CFR 50.73(a)(2)(v)(B), "Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat."

C. Cause of Event:

A subsequent investigation was performed to determine the cause of this event. The investigation determined that the cause of the event was a failure of the FLS and maintenance planner to use the appropriate technical human performance, maintenance behaviors and standards associated with the work package revision process. In this case, the work instructions were revised without obtaining the appropriate reviews.

Additionally, there was a lack of administrative barriers in place that would prevent both stop logs from being installed concurrently without prior approval. The stop logs have historically been controlled through maintenance work package instructions.

D. Safety Analysis:

The CCSW system provides cooling water to the containment cooling heat exchangers. CCSW provides both pressure and temperature control for the primary containment in the event of anticipated transients or accident conditions. TS 3.7.1 allows both CCSW subsystems to be inoperable for up to 8 hours. The 8 hour completion time is acceptable due to the low probability of a design basis accident during this period of time.

The CCSW system was inoperable for less than 4 hours. Since the probability of occurrence of a design basis accident was low in this case, the health and safety of the public was not compromised as a result of this event.

E. Corrective Actions:

The stop logs were immediately removed.

Dresden Maintenance is developing training to reinforce the role of owner and gatekeeper with the work planners.

Dresden Operations is evaluating the implementation of administrative controls for the stop logs.

Dresden Maintenance is developing and performing a dynamic learning activity to observe the behavior of work planners during the work package revision process.

Training Requests are being developed to evaluate the need for maintenance personnel receiving Technical Human Performance training.

F. Previous Occurrences:

A review of DNPS Licensee Event Reports (LERs) for the last three years did not identify any LERs associated with Losses of Safety Function of the CCSW system.