

UNITED STATES  
ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS  
REGION III  
799 ROOSEVELT ROAD  
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TELEPHONE  
(312) 858-2660

SEP 28 1973

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Jr.  
Vice President  
P. O. Box 767  
Chicago, Illinois 60690

Docket No. 50-237  
Docket No. 50-249

Gentlemen:

Thank you for your letters dated August 31 and September 20, 1973, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in our letter dated August 10, 1973. We will examine these matters during our next inspection.

Your cooperation with us is appreciated.

Sincerely yours,

James G. Keppler  
Regional Director

bcc w/ltrs dtd 8/31 and 9/20/73:  
RO Chief, FS&EB  
RO:HQ (4)  
Licensing (4)  
DR Central Files  
RO Files  
Regions I & II  
PDR  
Local PDR  
NSIC  
DTIE

AMSC  
J6



Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

August 31, 1973

Mr. Boyce H. Grier  
Regional Director  
Directorate of Regulatory  
Operations - Region III  
U.S. Atomic Energy Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Response to Letter of Boyce H. Grier to  
Byron Lee, Jr., Dated August 10, 1973,  
Concerning Apparent Dresden Units 2 and 3  
Violation of AEC Requirements, Dkts 50-237, 50-249

Dear Mr. Grier:

This letter is our response to the subject letter as required by Section 2.201 of the AEC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our statements are numbered to correspond to the items in your letter. We understand you do not require a response to Item 7 in your letter. Our response to the first six items is as follows:

1. Special Report No. 13 dated April 21, 1971 and Supplementary Information for Dresden Unit 2 Special Report No. 13 dated May 13, 1971, describe the ECCS Fill System. This description includes the pressure switches on the discharge lines of the LPCI pumps and Core Spray pumps. These reports were submitted when problems were experienced with maintaining these discharge lines full of water. We cannot find any mention in these reports of pressure switches on the HPCI pump discharge line which would assure that the line was full. It seems logical that no switches would be required since the entire discharge line is below the primary source of water for this system.

We therefore conclude the Technical Specifications for Units 2 and 3 are in error in requiring a surveillance check of these nonexistent switches. A request for a Technical Specification change to remove this requirement will be made.

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Commonwealth Edison Company

Mr. Boyce H. Grier

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August 31, 1973

2. Control rod exercising is normally scheduled for the weekends which in this case would have been June 2-3. On June 1, 1973, the failure of the Unit 2 permanent magnet generator (PMG) was detected. The unit was taken off system and the reactor held critical at about 500 psi while the repairs to the PMG were made. It was decided to delay exercising rods until steam flow was established; because the effects of rod movement on reactor pressure and water level are magnified at low power. The unit was scheduled to be back on system on Sunday, June 3, 1973. However, when the PMG problem was found to be bearing failures, the unit did not return to service but was shutdown and cooled down on Monday, June 4, 1973. Although no surveillance sheet was completed, all partially withdrawn rods were moved by noon on Monday when the reactor was shutdown.
3. Control rod accumulator alarm status on Unit 2 was not logged on April 30, 1973 and May 4 and 20, 1973. These occurrences in the past have been a failure to log the actual checks. Since these checks are a well established shift routine, we believe this omission was again a failure to log the check. However, it is impossible to prove this. The alarm status was logged on the following shifts which proves the alarms were operable.

A procedure for more frequent auditing of surveillance records is being established. This procedure should reduce the number of these log omissions.

4. The required IRM calibration test for the Unit 3 shutdown of March 4, 1973 was, in fact, conducted on March 3, 1973 at 200 MWe. An entry to this effect appears in the Shift Engineer's log of that date. The data sheet for this calibration has been located and is now available for inspection. The data sheet had been incorrectly filed.

The failure to conduct the required APRM functional tests, prior to the Unit 2 startups of January 13 and February 19, 1973, was due to an error in plant procedures. The procedures permitted startup following a scram or short outage with only an SRM and IRM instrument check. This section of the procedures had been written prior to the installation of the APRM 15% feature and its startup test requirement. The procedures will be revised to include a requirement to test the APRM 15% scram and rod block prior to every unit startup.

Commonwealth Edison Company

Mr. Boyce H. Grier

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August 31, 1973

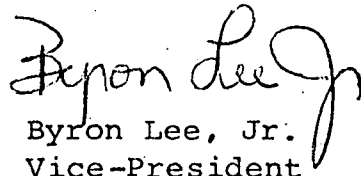
5. The Station, in the past, has relied on GEMAC metal temperature recorders to record the vessel shell temperature during heatup and cooldowns. The failure to have these temperatures recorded during the Unit 2 cooldown on March 25-26, 1973 was the result of a failure of the inking system on the Unit 2 recorder. Based on past experience with these temperatures and cooldown rates, the Station is confident the temperature differential limits in the Technical Specifications were not violated.

The inking system on these recorders has been changed to a felt tip pen system. This new system is proving to be more reliable. Secondly, a procedure change will be made to check that this recorder is inking at the beginning of every heatup or cooldown or to record these temperatures manually on a log sheet.

6. The identical reactor water sampling problem during the Unit 3 startup on June 6, 1973 was identified by a Nuclear Review Board audit prior to this AEC inspection. Corrective action in the form of revised procedures was already underway at the time of the AEC inspection. These procedure revisions have now been completed.

It is impractical and almost impossible to sample the reactor water exactly every four hours because of shift changes and other startup activities. The Technical Specifications do not give a tolerance to this time period. From a practical point of view, there must be a tolerance for this short sampling time. In an effort to develop a practical interpretation of this surveillance requirement, the Station has discussed this point with the Region III inspector. Our interpretation of this Technical Specification now is that these samples are to be taken every 4 hours as stated in the Specification. However, it will be acceptable if this time is extended to a maximum of 5 hours on infrequent occasions which result from unscheduled or unforeseen operating activities during these periods of low steam flow.

Very truly yours,

  
Byron Lee, Jr.  
Vice-President



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

September 20, 1973

Mr. James G. Keppler  
Regional Director  
Directorate of Regulatory  
Operations - Region III  
U.S. Atomic Energy Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Supplement 1 to Response to Letter of  
Boyce H. Grier to Byron Lee, Jr., Dated  
August 10, 1973, Concerning Apparent  
Dresden Units 2 and 3 Violation of AEC  
Requirements, AEC Dkts 50-237 and 50-249

Dear Mr. Keppler:

This letter supplements our response to the subject letter dated August 31, 1973. Our August 31 letter discussed the six items of apparent violation on Dresden Units 2 and 3. However, specific dates for completing the corrective action were not in all cases included. This supplement provides that information. The following dates for completing corrective action are numbered corresponding to the items in the subject letter.

1. The Technical Specification change concerning the HPCI pressure switches will be submitted by November 1, 1973.
2. As a corrective action for routine control rod exercising, we plan to submit a Technical Specification change that will increase the frequency of surveillance intervals beyond the present one week. This change will allow the required operating flexibility. We are presently performing a statistical evaluation of the results of control rod exercising done to date as a basis for such a Technical Specification change. This proposed Technical Specification change will be submitted by December 1, 1973.

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Commonwealth Edison Company

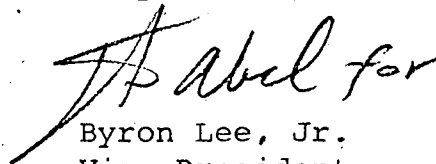
Mr. James G. Keppler

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September 20, 1973

3. The procedure for more frequent auditing of surveillance records will be established by October 1, 1973.
4. The procedures requiring tests of the APRM 15% scram and rod block prior to every unit startup will be established by October 8, 1973.
5. The procedure change to check the reactor temperature recorders at the beginning of every heatup and cooldown or to record these temperatures manually on a log sheet will be established by October 8, 1973.

Very truly yours,

A handwritten signature in cursive script that reads "Byron Lee, Jr." with a large, stylized initial "B".

Byron Lee, Jr.  
Vice-President