



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JUL 26 1977

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

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

Gentlemen:

This refers to the inspection conducted by Mr. W. D. Shafer of this office on July 13-15, 1977, of activities at Dresden Nuclear Power Station, Units 2 and 3, authorized by NRC Operating Licenses No. DPR-19 and No. DPR-25 and to the discussion of our findings with Mr. Stephenson at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further non-compliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of

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Commonwealth Edison
Company

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your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

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

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report
No. 50-237/77-18 and
No. 50-249/77-18

cc w/encls:

Mr. B. B. Stephenson,
Station Superintendent
✓ Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Anthony Roisman, Esq.,
Attorney

OFFICE	RIII <i>RCK</i>	RIII	RIII			
SURNAME	Shafer/ls	Knop <i>RCK</i>	Fiorelli <i>S</i>			
DATE	7/25/77					

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison Company

Docket No. 50-237

Docket No. 50-249

Based on the inspection conducted on July 13-15, 1977, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. This item is an infraction.

Contrary to 10 CFR 50, Appendix B, Criterion XIII, and the licensee's Quality Assurance Program, Chapter 13, proper measures have not been established to control the handling, storage, and preservation of material and equipment in accordance with work and inspection instructions, to prevent damage or deterioration. Present licensee procedures do not adequately address specific storage requirements, preventative maintenance programs or shelf life for items in storage.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-237/77-18; 50-249/77-18

Docket No. 50-237, 50-249 License No. DPR-19, DPR-25

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Power Station, Units 2 and 3

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: July 13-15, 1977

Inspectors: W. D. Shafer *RC Knop* 7-25-77

Approved by: R. C. Knop, Chief *RC Knop* 7-25-77
Reactor Projects Section 1

Inspection Summary

Inspection on July 13-15, 1977 (Report No. 50-237/77-18; 50-249/77-18)
Areas Inspected: Routine, unannounced inspection of licensee's hydrogen monitoring assessment of large lead storage batteries relating to Unit 2, review of previous outstanding items and a tour of plant areas. The inspection involved 20 inspector-hours onsite by one NRC inspector.
Results: Of the three areas inspected, no items of noncompliance or deviations were found in two areas; one apparent item of noncompliance was found in one area (Infraction, inadequate receipt storage and handling program, Paragraph 2).

DETAILS

1. Persons Contacted

- *B. Stephenson, Station Superintendent
- *B. Shelton, Administrative Assistant
- *N. Scott, Senior Operating Engineer
- *D. Farrar, Assistant Tech Staff Supervisor
- *R. Kyroutac, Quality Control Engineer
- *R. Rowland, Quality Assurance Engineer
- *J. Plese, Storekeeper
- *C. Schiavi, Engineer Assistant
- *D. Schildgren, Quality Assurance Engineer
- *G. Romba, Tech Staff Engineer
- *J. Nash, General Electric Resident Engineer

The inspector also talked and interviewed with other licensee employees, including members of the technical and engineering staff, and reactor operator personnel.

*denotes those attending the exit interview.

2. Followup on Previous Items of Concern (Units 2 and 3)

In a previous inspection report (50-237/76-28; 50-249/76-30), the inspector informed the licensee of the following weaknesses in their receipt storage and handling of safety related items.

- a. Procedures developed for special handling and storage are inadequate in that no provisions exist to identify the type of storage (i.e., indoor heated, humidity requirements, or outdoor storage).
- b. Procedures that exist to specify special preventative maintenance for storage items, are inadequate.
- c. The licensee's procedure DWP-2 relating to handling limited shelf life item, is vague in that the responsibility for reviewing equipment manuals to make a determination of shelf life is not assigned to any group.
- d. Chemicals (used in water chemistry controls or analysis), O-rings and diaphragms are not considered safety related, or treated as material with a given shelf life.

The licensee's Quality Assurance Program Chapter 13.0 states "written instructions for handling, preservation, storage and shipping will be used to specify special deterioration of materials and equipment." Additionally the program states "for items which are required to be stored for long periods of time or require special protection, storage instructions will specify specific protective environments necessary to prevent deterioration and damage." Instructions will provide for adequate safety, maintenance and preservation, special protective environments such as inertgas atmosphere and humidity and temperature control, periodic inspections, and periodic accountability.

In discussion with licensee representatives and a review of the licensee's program, the inspector determined that the licensee's handling and storage of safety related material is inadequate for the above described reasons. The inadequacy of this program was identified as an item of noncompliance and was discussed at the exit interview.

3. Plant Tour (Units 2 and 3)

The inspector walked through various areas of the plant to observe operations and activities in progress, to inspect the general state of cleanliness, housekeeping and adherence to fire protection rules.

The inspector noted that the housekeeping had deteriorated in the Auxilliary Building from the previous inspections. In many areas, oil and water had collected in puddles around major pieces of equipment and in general, debris was scattered throughout the building. This was discussed at the exit interview.

No items of noncompliance or deviations were identified.

4. Monitoring Assessment of Large Lead Storage Batteries (Unit 2)

The inspector conducted a tour of the Unit 2 battery room, conducted discussions with licensee representatives and reviewed surveillance records relating to the batteries. The following observations were made:

The following type of storage battery is used at the Unit 2 facility.

250 volt; Gould FPR 23, 880AH, 8-hour discharge rating
125 volt; Gould FPR-13, 480AH, 8-hour discharge rating
48/24 volt; Gould DPR-9, 80AH, 8-hour discharge rating

The Unit 2 battery room has a volume of approximately 40,656 cubic feet. However, approximately 20% of this volume includes numerous ducts and cable trays. Also, approximately 646 cubic feet of volume is taken up in batteries and major equipment, making the available free volume approximately 32,000 cubic feet.

A 5,000 CFM supply of air is available to the battery room at all times, however the licensee's surveillance procedures relating to battery testing do not address requirements to assure adequate flow rates. In further discussions with the licensee representatives the inspector determined that a loss of air flow in the battery room would not be alarmed in the control room.

With respect to hydrogen generation associated with the Unit 2 battery room the licensee has no program for detecting gross hydrogen generation and maximum local concentrations during charging operations. The inspector also noted that no fire protection system is available for the battery room.

The surveillance schedule for detection of bad cells is accomplished quarterly. During this surveillance the cell voltage and specific gravity of each cell is recorded on data sheets. Also the temperature of every fifth cell and any water addition is noted. The minimum cell voltage for any cell is 1.75 volts. When any cell is less than 1.75 volts that cell is removed from service by jumpering.

4. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on July 15, 1977. The inspector summarized the scope and findings of the inspection. The licensee representative made the following remarks in response to certain items discussed by the inspector.

Acknowledged the statement by the inspector with respect to the item of noncompliance (Paragraph 2). Stated that a responsible person has been assigned to the storeroom to resolve the problems.