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

CENTRAL FILES

JUL 23 1979

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:

Thank you for your letter dated July 3, 1979, informing us of the steps you have taken to correct the noncompliance identified in our letter dated June 13, 1979.

Through discussions with your station management, we obtained mutually agreeable clarifications to your response. It is our understanding that you will review all Engineered Safety Feature (ESF) Systems instead of all Emergency Core Cooling Systems (ECCS). Further, it is our understanding that you will review all safety related systems required for operation by your Technical Specifications and implement as necessary procedure and P&ID changes by March 1, 1980 for these systems accessible, and by the end of the next refueling outage for those systems inaccessible.

IIA2
CLP

7908150 286 Q

JUL 23 1979

We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

R. F. Heishman, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. B. B. Stephenson,
Station Superintendent

cc w/ltr dtd 7/3/79:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Anthony Roisman, Esq.,
Attorney
Mr. Dean Hansell, Office of
Assistant Attorney General

RIII	RIII	RIII	RIII
Walker/blk	Spessard	Heishman	Barker
7/13/79		7/19	

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

July 3, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

SUBJECT: Dresden Station Units 2 and 3
Response to IE Inspection Report
Nos. 50-237/79-13 and 50-249/79-11.
NRC Docket Nos. 50-237 and 50-249

REFERENCE (a): June 13, 1979 letter from R. F. Heishman to
Byron Lee, Jr. transmitting IE Inspection
Report Nos. 50-237/79-13 and 50-249/79-11

Dear Mr. Keppler:

Reference (a) contained the results of an inspection by Messrs. R. D. Walker and J. L. Barker of your office on May 2 - 18, 1979 of activities at Dresden Station Units 2 and 3. During this inspection, certain activities appeared to be in noncompliance with NRC requirements. Commonwealth Edison Company's response to the item of noncompliance is contained in Attachment A to this letter.

Please address any additional questions that you might have concerning this matter to this office.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

Attachment

JUL 6 1979

7908150299 9

ATTACHMENT A

Infraction

Technical Specification 6.2.A.1. requires that detailed written procedures, including applicable checklists covering normal startup, operation, and shutdown of the reactor and other systems and components involving nuclear safety of the facility, shall be prepared, approved and adhered to.

10CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Commonwealth Edison Company Quality Assurance Manual Quality Requirement 5.0, paragraph 5.1 states "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists." Quality Procedure 5-51 of the same manual states "Checkoff lists are included for complex operations and documentation. These lists delineated in detail the steps an operator must follow in order to complete an operation."

Contrary to the above, the applicable valve/breaker/switch alignment procedures for the High Pressure Coolant Injection System, the Core Spray System and the Emergency Core Cooling Keepfill System contain numerous discrepancies with respect to the lineups stipulated in current Piping and Instrumentation Drawings (P & ID's). The discrepancies included: valves omitted, valves misaligned, and misnamed or unnamed valves, breakers and switches.

Corrective Action Taken and Results Achieved

The valve and breaker/switch alignment checklists which were considered inadequate are used after an extended shutdown period to provide directions for returning all the valves in the systems to their desired position prior to operation. Actual valve positions were verified during the inspection to be correct such that the valves could fulfill their intended function. Commonwealth Edison agrees, however, that the checklists should be consistent with the Piping and Instrumentation Drawings (P & ID's) and has initiated a priority program to review each of these checklists against the P & ID's and to make corrections as necessary to both documents.

ATTACHMENT A

Corrective Action Taken and Results Achieved (Cont'd)

In addition, the actual position of all important valves and breakers/switches in these systems is checked much more frequently by other procedures. For example, DOP 040-5 currently requires a daily check of important manual and motor operated valve positions, pump status, and diesel generator alignment necessary for automatic operation of all ECCS systems, the Isolation Condenser, and the Standby Liquid Control System. Other procedures are used to ensure that these systems are returned to operable conditions after maintenance activities through tests and surveillances.

Corrective Action to be Taken to Avoid Further Noncompliance

As previously indicated, Commonwealth Edison has initiated a priority program to compare each of the ECCS systems mechanical and electrical checklists with the appropriate Piping and Instrumentation Drawing and to initiate corrections, if necessary, to both documents. This program will include a field verification of the valve and breaker numbers of accessible components, the identification tags attached to them and, where applicable, any locking devices which might be attached. Numbers will be assigned to those instrument stop valves which are currently unnumbered. Since the checklists reflect valve and breaker alignments while shutdown and the P & ID's show positions during normal operation, some differences should and will continue to exist between them, but these differences will be reviewed to ensure that they properly reflect the desired position information.

Date of Full Compliance

The reviews will be completed by August 1, 1979, for accessible equipment, and the applicable procedure changes and/or drawing change requests will be prepared and approved by September 1, 1979. The reviews of inaccessible equipment will be completed and the necessary procedure changes implemented prior to startup following the next refueling of each unit.