



Commonwealth Edison
Dresden Nuclear Power Station
R.R. #1
Morris, Illinois 60450
Telephone 815/942-2920

June 21, 1991

EDE LTR #91-372

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Licensee Event Report #91-010, Docket #050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(i)(B).

Lawrence F. Mervin
for

E. D. Eenigenburg
Station Manager
Dresden Nuclear Power Station

EDE/dwh

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III
File/DVR
File/Numerical

ZDVR/240

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2										Docket Number (2) 0 5 10 10 12 13 17			Page (3) 1 of 0 3		
Title (4) Liquid Radwaste Discharge Composite Sample Discrepancy Due To Procedure Deficiency															

Event Date (5)			LER Number (6)				Report Date (7)			Other Facilities Involved (8)						
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names		Docket Number(s)					
0	5	3	0	9	1	9	1	0	1	0	0	0	10	12	14	19
										Dresden 3						
										N/A						

OPERATING MODE (9) N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)																				
POWER LEVEL (10) 0 7 5		<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 50.73(a)(2)(x)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 73.71(c)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)

LICENSEE CONTACT FOR THIS LER (12)

Name T. R. Murphy Technical Staff System Engineer										Ext. 2244			TELEPHONE NUMBER AREA CODE 8 1 5 9 4 2 -2 19 12 10		
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)

Yes (If yes, complete EXPECTED SUBMISSION DATE)										Expected Submission Date (15)			Month Day Year		
X NO															

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

During an upgrade of Dresden Chemistry Procedures (DCP), it was determined that the method of preparing the monthly River Discharge composite sample per DCP 2000-28, River Discharge Card, failed to comply with Technical Specification 4.8.3. Notation 2. The composite sample had previously been prepared by saving a 100 milliliter sample aliquot from each tank discharged regardless of the volume of the discharge. Technical Specification 4.8.3. Notation 2 requires a proportionate sample for each tank discharged based on the volume of the discharge. In this way the monthly composite sample would be more representative of the total volume discharged during the month. The root cause of this discrepancy was attributed to procedure deficiency. No River Discharges were permitted until the Chemistry Department implemented the necessary procedure changes to ensure that a proportionate sample based on the volume of the discharge from each tank is used to prepare the monthly composite sample. The safety significance of this event is minimal in that review of composite sample analysis data indicates significant margin to the maximum allowable limits. This is the first occurrence of this type at Dresden Station.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						Page (3)		
		Year	///	Sequential Number	///	Revision Number				
Dresden Nuclear Power Station	0 5 0 0 0 2 3 7	9 1	-	0 1 0	-	0 0	0 2	OF	0 3	

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 Mwt rated core thermal power

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX)

EVENT IDENTIFICATION:

Liquid Radwaste (WD) Discharge Composite Sample Discrepancy Due to Procedure Deficiency

A. CONDITIONS PRIOR TO EVENT:

Unit(s): 2(3) Event Date: May 30, 1991 Event Time: 1410 Hours
 Reactor Mode(s): N (N) Mode Name(s): Run(Run) Power Level(s): 75%(45%)
 Reactor Coolant System (RCS) Pressures: 984 (994) psig

B. DESCRIPTION OF EVENT:

On May 30, 1991 at 1410 hours with Unit 2 and Unit 3 under normal power operation, Chemistry Department personnel determined that the method of preparing the monthly Liquid Radwaste Discharge Composite Sample did not comply with Technical Specification 4.8.3. Notation 2. There were no maintenance activities or operations in progress at the time that had any relationship to this event. There were no systems inoperable at the time that contributed to this event. Upon discovery of the deficiency, no further River Discharges were permitted pending further investigation. Temporary Procedure Changes were initiated for Dresden Chemistry Procedure (DCP) 2000-28, River Discharge Card, and DCP 1018-03, Radioassay Shipments. The deficiency was discovered during an upgrade of the Dresden Chemistry Procedures.

C. APPARENT CAUSE OF EVENT:

This report is submitted in accordance with 10CFR 50.73 (a)(2)(i)(B), which requires the reporting of any condition prohibited by the Technical Specifications.

The cause of the failure to comply with Technical Specification 4.8.3. Notation 2 was procedure deficiency, in that an inadequate method of preparing the monthly composite sample was used. The sample from each individual tank discharged was not necessarily exactly proportionate to the volume of the discharge, in that a 100 milliliter sample aliquot for each discharge was used regardless of the volume of the discharge.

D. SAFETY ANALYSIS OF EVENT:

The safety significance of this event was minimal because review of composite sample analysis data indicates significant margin to the maximum allowable limits for Gross Alpha, Tritium, Iron-55, and Strontium 89-90. This review, based on actual data from 1988 through 1990, concluded that the largest effect for a single month was 0.525% error introduced by the sampling method deficiency. This error is significantly less than the statistical error associated with the analysis. Therefore, the limits specified in Appendix B, Table II of 10 CFR Part 20 are not believed to have been violated. It should also be noted that all discharges are sampled for Gamma activity at the time of discharge.

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		Year	Sequential Number	Sequential Number	Revision Number	Revision Number				
Dresden Nuclear Power Station	0 5 0 0 0 2 3 7	9 1	-	0 1 0	-	0 0	0 3	OF	0 3	

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E. CORRECTIVE ACTIONS:

Temporary Procedure Change 91-124 to DCP 2000-28 and Temporary Procedure Change 91-125 to DCP 1018-03 were made to ensure that a proportionate sample from each tank based on the volume of the discharge is used to prepare the monthly composite sample. These two Temporary Procedure Changes will become permanent changes (237-200-91-09001). The remaining Commonwealth Edison sites were notified to verify that proper compositing methods are utilized. A summary of this event was also submitted to the INPO Nuclear Network System to notify other utilities.

F. PREVIOUS OCCURENCES:

This is the first occurrence of its type at Dresden Station.

G. COMPONENT FAILURE DATA:

N/A