



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 24, 1991

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

Attn: Document Control Desk

Subject: Dresden Station Units 2 and 3
Response to Open Items
Inspection Report 50-237/91015; 50-249/91014
NRC Docket Nos. 50-237 and 50-249

Reference: G.C. Wright letter to Cordell reed dated
June 26, 1991 transmitting NRC Inspection
Report 50-237/91015; 50-249/91014

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Open Items which were transmitted with the referenced letter and Inspection report. The two Open Items were related to training completion signoffs on modification packages, and revising the core flow correlation for Unit 2 Cycle 13. CECo's response to the identified Open Items is provided in the following attachment.

If your staff has any questions or comments regarding this response, please refer them to Rita Radtke, Compliance Engineer, at (708)515-7284.

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Nuclear Licensing Manager

cc: A. Bert Davis, Regional Administrator - Region III
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RESPONSE TO OPEN ITEM
IR 50-237/91015; 50-249/91014

Open Item 237/91015-01; 249/91014-01

A concern was identified related to inadequate training or notification of appropriate personnel concerning the implementation of a modification to the power feed to the "A" SBGTS. "The inspector verified that even though the modification record indicated that training had been completed, 25% ... of the licensed personnel had not received training nor were they provided with required reading for the implementation of this modification. It appeared that the form had been signed as training completed based on all specified training sessions having been held rather than ensuring that all personnel had received the training. The intent of the training department had been to provide required reading concerning missed material for personnel who failed to attend training sessions. The licensee should determine what is meant by the signature box "training completed" on the modification record form."

RESPONSE

A review was performed by the Training Supervisor and an Assistant Technical Staff Supervisor of Procedure DAP 5-1, "Plant Modification Program." Signature of Modification Installation Record Form, Item 7, "Training Required for Operation is Complete," by the Training Supervisor verifies that required training for operation is complete. This signature is not a verification for the identification of required training.

The Training Department currently has a process to track all modifications which require training. The Training Supervisor will revise this process to differentiate between modifications which require specific training to be complete prior to operation, and those modifications which require training as a matter of informing personnel that the modification installation has been complete.

Training that is determined not to be required prior to operation will be documented in Part 4 of the Post-Modification Document Control Checklist as per DAP 5-1.

This clarification and process revision will be discussed by the Training Supervisor with all Training Supervisor signature alternates.

RESPONSE TO OPEN ITEM
IR 50-237/91015; 50-249/91014

Open Item 237/91015-03

A concern was identified related to the failure to update the core flow correlation used for calculating adherence to the fuel thermal limit requirements. "The post-modification testing for this design change was reviewed and determined to be appropriate. The test performed in April, 1991 correctly generated a new correlation between the drive flow and total core flow. This correlation is normally performed after each outage to determine the effect of crud buildup during the previous cycle. However, the results of the new correlation were not utilized in the current thermal limits calculations. As a result, the plant computer was using the previous cycle's correlation for this comparison at the time of the inspection. However, if they had operated close to thermal limits and the WT versus WD correlation from the previous cycle were used to determine core flow, the potential existed for the operators to be unaware that they had exceeded fuel thermal limits.

Step 15 of Section I of procedure DTS 8148, "Station Computer Nuclear Program and Data Verification While Using POWERPLEX," revision 10, required that as soon as possible update the substitute core flow correlation (WTC versus WDC) into the computer. However, the amount of time specified by "as soon as possible" was not specified."

RESPONSE

The WTSUB correlation provides an alternate method of determining total core flow in the event that normal total core flow indication is lost. For this reason, the correlation is updated each operating cycle. During the time period between Unit 2 Cycle 13 startup and the actual implementation of the new correlation, the process computer used the normal total core flow for calculation of the core thermal limits; therefore, the WTSUB correlation was not utilized.

The core flow correlation (WTC versus WDC) was updated and fully approved for Unit 2 Cycle 13 operation on June 7, 1991. The update was performed per DTS 8238, "Computer Program Input Deck Revisions," as required by DTS 8148.

Currently, DTS 8148 requires update of the WTC versus WDC correlation "as soon as possible" following startup. Procedure DTS 8148 will be revised to specify that the update of the core flow correlation be complete within two weeks of the final data collection to allow sufficient time to develop the correlation from the raw data and complete the required paper work. The procedure revision will be completed prior to Unit 3 Cycle 13 startup which is currently scheduled for mid November, 1991.

Additionally, a computer search will be performed to identify any other procedures containing the phrase "as soon as possible." A sample of these procedures will be reviewed to determine if clarification is necessary. Procedure revisions and expansion of the review will be performed as necessary.