

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station - Units 2 and 3

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

During an NRC inspection conducted on June 29 through August 22, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company's Quality Assurance Program, requires in part, that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings.

- a. Dresden Maintenance Procedure (DMP) 0200-12, "Reactor Shroud Head and Steam Separator Installation," Revision 7, Steps G.12 a-e, detailed actions necessary to lock and tighten the steam separator shroud head hold down bolts.

Contrary to the above, on November 26, 1990, mechanical maintenance failed to accomplish the locking and tightening of the steam separator shroud hold down bolts in accordance with DMP 0200-12.

- b. Dresden Administrative Procedure (DAP) 9-11, "Procedure Usage and Adherence," Revision 2, Step 0.(3) stated that when a step is initialed or signed, it must be based on either direct observation, or a direct report such as face-to-face communication. If other than direct observation is utilized, then the initials of the person performing the observation must be included with the initials of the person actually initialing the step.

Contrary to the above, on November 26, 1990, procedure DMP 0200-12, Steps G.12 d-e and G.15, were initialed by a foreman without direct observation of the step performed, and without obtaining the initials of any of the mechanical maintenance crew members who performed the observation of Steps G.12 d-3 and G.15.

- c. DAP 9-12, "Procedure Usage and Adherence," Revision 2, defined independent verification as the certification of the correctness of an operation or condition based on either first-hand observation or through personally performed manipulation.

Contrary to the above, on November 26, 1990, the steam separator shroud hold down bolts were independently verified and procedure DMP 0200-12, Step G.12 f, was initialed without adequately verifying shroud head bolt tightness.

This is a Severity Level IV violation (Supplement I).

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2. 10 CFR 50, Appendix B, Criterion XVI, states, in part, that measures shall be established to ensure that conditions adverse to qualities such as deficiencies, deviations, and non-conformances, are promptly corrected. In the case of significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and the corrective action taken to preclude repetition.

Contrary to the above, previous corrective actions to a significant condition adverse to quality for failure to report an engineered safety features actuation on December 8, 1990, to the NRC were not adequate to preclude the repetition of licensee personnel not reporting an engineered safety features actuation to the NRC of a similar nature on July 4, 1991.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company's Quality Assurance Program, requires in part, that activities affecting quality be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above, from February 2, 1991, to August 22, 1991, a procedure prescribing an activity affecting quality was inadequate, in that the procedure (Unit Operator's Daily Surveillance Log Appendix A) used to perform instrument checks on torus wide range level instrumentation did not prescribe the appropriate qualitative or quantitative acceptance criteria or provide instructions for determining satisfactory operability of such equipment.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the U. S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois
this 12th day of Sept. 1991.


W. D. Shafer, Chief
Reactor Projects Branch 1