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

DCD/DCB (RIDS)

NOV 2 9 1991

Docket Nos. 50 237; 50-249
Licenses No. DPR-19; DPR-25
EA Nos. 91-164; 91-165

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Reed:

This confirms our plans as discussed between Robert Lerch of this office and Perry Barnes of your staff to conduct two enforcement conferences beginning at 9:00 a.m. CST on December 10, 1991, at the Holiday Inn, 1250 Roosevelt Road, Glen Ellyn, Illinois.

The purpose of this meeting is to discuss the findings of inspections performed at Dresden Station which identified apparent violations of NRC requirements. The first conference is to discuss our conclusions regarding four recent events which, in aggregate, indicate a significant management breakdown. The second conference is to address a failure to maintain primary containment requirements; and, additionally, a failure to maintain secondary containment requirements via a trackway door.

Inspection reports will be provided to you prior to our scheduled meeting; summaries of the apparent violations and concerns are provided in two enclosures for your review. At each enforcement conference, you should be prepared to provide an oral presentation and a concise written handout addressing the root causes and contributing factors for the apparent violations and any corrective actions you have taken or planned.

If you have any questions regarding this meeting, please contact Robert Lerch at (708) 790-5500.

Sincerely,

William L. Forney
for Edward G. Greenman, Director
Division of Reactor Projects

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Enclosures: As stated

See Attached Distribution

Distribution

cc w/enclosure:
D. Galle, Vice President - BWR Operations
T. Kovach, Nuclear Licensing Manager
Dresden Station Manager
DCD/DCB (RIDS)
OC/LFDCB
Resident Inspectors LaSalle, Dresden, Quad Cities
Richard Hubbard
J. W. McCaffrey, Chief, Public Utilities Division
Robert Newmann, Office of Public Counsel, State of Illinois Center
Licensing Project Manager, NRR

Operations

This enforcement conference will address the apparent violations and our concerns related to four events at Dresden. Those events were the torus heatup, the out-of-sequence rod scram, the fuel handling error, and the hydraulic control unit (HCU) spill. More specifically the issues are:

1. In regards to the torus heatup event, we noted a number of instances where individuals failed to adhere to procedures including inadequate logs, inadequate turnovers, inadequate upward communications in the operations chain of command, and inadequate oversight of plant conditions. In addition, procedures for interim turnovers were found inadequate.

2. In regards to the HCU spill, the procedure for maintaining an out-of-service boundary was found inadequate and adherence to procedures by equipment attendants was also inadequate.

3. In regards to the out-of-sequence rod scram, two instances of failure to follow the procedure were identified along with operators "working around" equipment deficiencies.

4. In regards to the fuel handling error, the problem began with a failure to follow procedures. A lack of safety perspective on the part of the workers compounded the event when fuel moves were continued after damaging the mast and some fuel bundle bails. The supervisor was unaware of the need to promptly communicate an abnormal occurrence to management. The lack of adequate abnormal procedures associated with fuel handling activities was a contributing factor.

5. Common to these events is a failure by workers to meet management expectations such that events like these are avoided or minimized. In the aggregate, these events are considered to represent a management failure to take adequate corrective actions to assure that worker performance will meet management expectations.

Containment

This enforcement conference will address the apparent violations and our concerns regarding the inoperability of containment isolation valve 3-1601-24 and the lack of design control regarding the addition of an active retractable seal to the Unit 2 outer trackway door.

Valve 3-1601-24 is an outer containment isolation valve on the drywell/torus purge system. During the last operating cycle on Unit 3, this valve was inoperable in that the valve was partially open when the valve operator was fully closed. If a loss of coolant accident along with a single failure of one of the inner containment isolation valves on that line had occurred during the previous cycle, a direct path to atmosphere would have existed.

A retractable seal was installed on the outer trackway door for Unit 2. This retractable seal replaced a passive seal and was installed under the auspices of a work package. It was not recognized as a modification by your staff. After post installation testing, the seal was left retracted while secondary containment was required. With the seal retracted, the required secondary containment negative pressure could not be maintained while the inner trackway door was open.

In addition to your discussion on the root cause and contributing factors for these violations, you should be able to discuss whether the corrective actions from the escalated 10 CFR 50.59 violation involving the Dresden sample valves (EA 90-168) should have identified the unauthorized modification that occurred on the trackway door seal.