Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

December 5, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Unresolved Item Associated with
Inspection Report 50-237/91026; 50-249/91027
NRC Docket Numbers 50-237 and 50-249

Reference: (a) W. D. Shafer letter to Cordell Reed dated October 18, 1991 transmitting NRC Inspection Report 50-237/91026; 50-249/91027

(b) Telephone Call between CECo (R. Radtke) and NRC Region III (H.A. Walker) on November 18, 1991

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Unresolved Item which was transmitted with the Reference (a) letter and Inspection Report. The Unresolved Item was relative to a concern with the interval between scheduled Preventative Maintenance (PM) tasks and inspections, and the methods utilized to modify the frequency of PM tasks. Reference (b) requested and received an extension to the due date of this required response to December 6, 1991 to complete a technical evaluation and provide the action plan based on the results of the evaluation.

If there are any questions or comments regarding this response, please contact Rita Radtke, Compliance Engineer, at 708/515-7284.

Very truly yours,

T. J. Kovach
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III
B.L. Siegel, Project Manager, NRR
W.G. Rogers, Senior Resident Inspector, Dresden

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INSPECTION REPORT 50-237/91026; 50-249/91027
RESPONSE TO UNRESOLVED ITEM

UNRESOLVED ITEM 237/91026-01: 249/91027-01:

The inspectors were concerned with the interval between scheduled PM tasks and inspections, and that the surveillance coordinator had changed the frequency of procedure DMS 6600-01 without system engineer knowledge or a technical evaluation of the effect on system performance. This item is considered unresolved until the licensee complete a technical evaluation of the PM tasks and interval that are necessary to properly maintain the diesel, and reviews the methods used to change the frequency of PM tasks.

RESPONSE:

1. A technical evaluation has been conducted to determine if Dresden Station could safely extend (to every Refuel, approximately 18 months) the frequency of those diesel generator mid-cycle maintenance surveillances requiring that the diesel be taken out of service.

   The following procedures were found to be applicable, that is, were intended to be performed mid-cycle and with the diesel out of service:

   Mechanical: DMS 6600-01 Rev. 01
   Instrument: none
   Electrical: DES 6600-07 Rev. 01
   DMP 6600-7 Rev. 3

   During the course of this evaluation, the following documents were reviewed:

   Diesel Generator Total Job Management History
   Diesel Generator General Surveillance (GSRV) Requirements
   Diesel Generator Problem Analysis Data Sheet 90-36
   Diesel Generator Deviation Report 12-2/3-90-55
   Dresden Station Safety System Functional Inspection Report
   ATESI TSA and maintenance history evaluation
   ATESI System Unavailability Monitoring (SUMS) Study
   ATESI Preventative Maintenance (PM) Consolidation Study
   Morrison-Knudsen Diesel Generator Procedure Review

   After careful evaluation of the procedure requirements and the basis for those requirements, we have concluded that none of the PM actions need be performed more often than every refuel. The document containing the specific requirements of each procedure and our evaluation of each is available for review at the station.

   The PM actions that can be safely performed without taking the diesels out of service should be retained in their current procedures and performed in accordance with the GSRV schedule; the remaining PMs should be deleted from their current procedure and added to the respective 18 month/refuel procedures.

   An exception to the above is the 2/3 diesel generator which does not have a refuel outage associated with it, and therefore will normally require an out of service for PM activities.

2. A review of the methods used to change the frequency of PM tasks has been conducted. Dresden Administrative Procedure (DAP) 11-2, "Surveillance and Periodic Task Scheduling Program," does not currently require approval above the level of the Department and Station Surveillance Coordinators for changes to PM Tasks. DAP 11-2 will be revised to require an appropriate level of approval for changes to the frequency of PM tasks.

   In addition, neither DAP 11-2, nor DAP 4-2, "Dresden Preventive Maintenance Program Control," currently require a technical evaluation for rescheduled, cancelled, or changed PM tasks. DAP 4-2 will be revised to specify a method of management review in all cases and technical evaluation, where appropriate, for PM tasks that are to be rescheduled past their critical date, cancelled, or changed. DAP 11-2 will also be revised to reference the above mentioned requirements of DAP 4-2.

   These actions will be completed by January 13, 1992.