

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-237/91041(DRS); 50-249/91045(DRS)

Docket Nos. 50-237 and 50-249

Licenses No. DPR-19 and DPR-25

Enforcement Action No. EA-91-164

Licensee: Commonwealth Edison Company
Opus West III
Downers Grove, IL 60515

Facility Name: Dresden Station Unit 2 and Unit 3

Meeting Conducted: December 10, 1991

Meeting At: Holiday Inn, Lombard, IL

Type of Meeting: Enforcement Conference

Inspectors: Maura for 12/16/91
V. P. Loughheed Date

Maura for 12/16/91
G. M. Nejfelt Date

Reviewed By: Monte P. Phillips for 12/16/91
Monte P. Phillips, Chief Date
Operational Programs Section

Approved By: Geoffrey C. Wright for 12/16/91
Geoffrey C. Wright, Chief Date
Operations Branch

Meeting Summary

Areas Discussed: Three apparent violations were presented. The first, failure to perform adequate post-maintenance testing (e.g., local leak rate testing), resulted in the "Unit 3 Torus and Drywell Outer Isolation Purge Valve," 3-1601-24, being unknowingly left partially open (i.e., subsequent local leak rate testing could not pressurize the piping) for approximately 18 months during periods of reactor power operations. Efforts were taken and additional items planned by the licensee to ensure that necessary post-maintenance testing will be performed. The second and third items, concerning the Unit 2 Reactor Building Trackway Outer Door Seal, addressed failures: (1) to perform required design control of the door seal replacement; and (2) to

take appropriate compensatory action with door seals manually defeated (e.g., secondary containment degradation). The door seal unauthorized modification has been returned to its original acceptable configuration.

DETAILS

1. Enforcement Conference Attendees

Commonwealth Edison Company

D. Galle, Vice President, BWR Operations
K. L. Graesser, General Manager of Boiling Water Reactor Operations
C. W. Schroeder, Station Manager, Dresden
E. Eenigenburg, Former Station Manager, Dresden
S. L. Trubatch, Counselor, [Firm of] Sidley & Austin
T. Kovach, Nuclear Licensing Manager
G. L. Smith, Assistant Operations Superintendent, Dresden
M. Gallaway, Mechanical Maintenance Staff, Dresden
T. Dolan, Senior Work Analyst, Dresden
B. Colebank, Maintenance Staff, Dresden
R. Janecek, Offsite Review Senior Participant, Corporate
M. Korchynsky, Unit 3 Operating Engineer, Dresden
R. Scott, Station Control Room Engineer, Dresden
M. Parcell, Shift Engineer, Dresden
M. Vincent, Radwaste Staff
S. Lawson, Safety Systems Group Leader, Technical Staff, Dresden
N. DuBuy, Safety Assessment
K. Deck, Onsite Nuclear Safety
W. E. Morgan, Dresden Station
R. Radtke, Nuclear Licensing
P. Barnes, Nuclear Licensing

Illinois Department of Nuclear Safety

R. Zoffa, Resident Inspector, Dresden

U. S. Nuclear Regulatory Commission

A. B. Davis, Regional Administrator, Region III
T. O. Martin, Deputy Director, Division of Reactor Safety (DRS)
G. C. Wright, Chief, Operations Branch, DRS
B. Clayton, Chief, Project Branch No. 1, Division of Reactor Projects (DRP)
W. Troskoski, Acting Director, Enforcement and Investigation Coordination Staff (EICS)
C. A. Mohrwinkel, Senior Management Analyst and Attorney, Office of Nuclear Reactor Regulation (NRR)
B. A. Berson, Regional Counsel
B. L. Burgess, Chief, Project Section 1B, DRP
B. Siegel, Dresden Project Manager, NRR
G. M. Nejfelt, Regional Inspector, DRS
R. M. Lerch, Project Engineer, DRP

C. H. Weil, Enforcement Specialist, EICS
M. Peck, Resident Inspector, Dresden
D. Liao, Reactor Engineer, DRP
W. Pegg, NRR Technical Intern, Region III

2. Enforcement Conference

An Enforcement Conference was held at the Holiday Inn, in Lombard, Illinois on the afternoon of December 10, 1991. The conference was conducted as a result of the preliminary findings of inspections conducted between August 29, 1991, and November 15, 1991, in which apparent violations of NRC regulations and license conditions were identified. Inspection findings were documented in Inspection Reports No. 50-237/91027(DRP) and No. 50-249/91035(DRS), and were transmitted to the licensee by letters dated November 15, 1991, and November 27, 1991.

The purposes of the enforcement conference were to discuss the apparent violations, their causes, and the licensee's corrective actions; to determine if there were any escalating or mitigating circumstances; and to obtain any other information which would help determine the appropriate enforcement action. Following introductory remarks, the NRC staff opened the conference by stating the purpose of the conference and the NRC concerns, presenting a brief description of the apparent violations, and summarizing the inspection findings. The licensee did not contest any of the apparent violations.

The licensee was requested by the NRC to discuss the following:

- o Failure to perform adequate post-maintenance testing (e.g., local leak rate testing) of the Unit 3 Drywell and Torus Outboard Isolation Purge Valve, 3-1601-24;
- o Failure to apply appropriate design control in the modification of the Unit 2 Reactor Building Trackway Outer Door Seal; and
- o Failure to take necessary compensatory action with the Unit 2 Reactor Building Trackway Outer Door Seal manually defeated.

The licensee presented their assessment of the above apparent violations. The licensee described the events which led to the apparent violations, including root causes and corrective actions taken or planned, and presented their determination of the safety significance. (See Enclosure 2)

At the conclusion of the conference, the licensee was informed that they would be notified of the final enforcement action in subsequent correspondence.