



Commonwealth Edison
Dresden Nuclear Power Station
R.R. #1
Morris, Illinois 60450
Telephone 815/942-2920

December 23, 1991

CWS LTR #91-068

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

Licensee Event Report 91-42, Docket 050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(ii).

L. J. Hermer for 12/24/91

Charles W. Schroeder
Station Manager
Dresden Nuclear Power Station

CWS/cfq

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III
NRC Resident Inspector's Office
File/NRC
File/Numerical

(ZDVR/421)

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2 Docket Number (2) 0 15 10 10 10 12 13 17 Page (3) 1 of 0 3

Title (4) Cable Separation Criteria Not Met Due to Original Construction Design Deficiency.

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
1	1	2 7 9 11	9 11	0 4 2	0 0	1	2	2 3 9 11	Dresden Unit 3	0 15 10 10 10 12 14 19

OPERATING MODE (9) N

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

Name Emory Johnson, Technical Staff System Engineer Ext. 2603 TELEPHONE NUMBER AREA CODE 8 1 5 9 4 2 1 - 2 9 12 10

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

X Yes (If yes, complete EXPECTED SUBMISSION DATE) NO Expected Submission Date (15) 0 6 1 17 9 12

ABSTRACT (Limit to 1400 spaces, i.e, approximately fifteen single-space typewritten lines) (16)

While performing a walkdown for a proposed modification to re-install feed cable to Unit 2 480V Motor Control Center (MCC) 29-2, it was discovered that the existing cabling crossed from Engineered Safety System (ESS) Division II to ESS Division I along its cable pan routing. This condition is contrary to system separation criteria. Upon further investigation, three other MCC feed cables were identified as being of concern. Corrective actions were to initiate modifications M12-2-91-027 and M12-3-91-027 to recable and divisionally reroute the feed cabling from Unit 2 480V Bus 29 to MCC 29-2, from Unit 2 480V Bus 28 to MCCs 28-3 and 28-2, and from Unit 3 480V Bus 38 to MCC 38-2. Both Units 2 and 3 were shutdown and depressurized at the time these discrepancies were discovered. These modifications will be completed prior to the startups of Unit 2 and Unit 3. No previous events of this type have been identified. The Commonwealth Edison Co. Nuclear Engineering Department is performing a comprehensive investigation into this event; a supplemental report will be submitted upon its completion.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						Page (3)		
		Year	///	Sequential Number	///	Revision Number				
Dresden Nuclear Power Station	0 5 0 0 0 2 3 7	9 1	-	0 4 2	-	0 0	0 3	OF	0 3	

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

D. SAFETY ANALYSIS OF EVENT:

An Operability and Safety Assessment for the physical routing of the subject MCC feeder cables was performed. The assessment determined that there existed a lack of physical separation between cables providing redundant safety functions; however, for an external event (including fire, missiles, flooding, etc.) a simultaneous Design Basis Loss of Coolant Accident (LOCA) is considered to be beyond design basis. Therefore, a failure of the subject cable raceways is not considered a credible single failure during a LOCA. In the event of a fire or other external event resulting in multiple cable damage in the area of concern the use of Appendix R Safe Shutdown procedures provides assurance that the plant could be safely shut down. This is documented in a report from NED to Dresden Station dated December 13, 1991.

E. CORRECTIVE ACTIONS:

The immediate corrective actions were to perform a review to identify the population of similarly routed cables on both units. Upon the initial results of this NED review, modifications M12-2-91-027 and M12-3-91-027 were initiated. M12-2-91-027 will recable and divisionally reroute the feed cabling and breaker control cabling from Bus 28 to MCC 28-2, Bus 28 to MCC 28-3, and from Bus 29 to MCC 29-2. M12-3-91-027 will recable and divisionally reroute the feed cabling and breaker control cabling from Bus 38 to MCC 38-2. Both modifications will be completed prior the the startup of Unit 2 and Unit 3, respectively. A Supplemental Report will be submitted following the completion of the modifications and investigation (237-200-91-22501).

F. PREVIOUS OCCURENCES:

LER/Docket Numbers Title

None. This is the first reported instance of this type.

G. COMPONENT FAILURE DATA:

<u>Manufacturer</u>	<u>Nomenclature</u>	<u>Model Number</u>	<u>Mfg. Part Number</u>
N/A	N/A	N/A	N/A

Since no component failure was identified with this event, this section is not applicable.