



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 2, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Updated Response to Notice of Violation Associated with
Inspection Report 50-237/91016; 50-249/91015
NRC Docket Nos. 50-237 and 50-249

Reference: T. Kovach memo to U.S. NRC, dated August 14, 1991;
transmitting Commonwealth Edison's (CECo) response to
NRC Notice of Violation 50-237/91016; 50-249/91015.

In the referenced letter, CECo provided our response to the Notice of Violation (NOV) related to the periodic calibration of fail-safe pressure switches. The purpose of these switches is to initiate the actuation of various safety-related valves and dampers to their respective fail-safe positions on loss of instrument air pressure to their operators. With respect to Corrective Action No. 3 associated with Violation No. 1, CECo indicated a new station procedure(s) would be written to provide an adequate means of ensuring proper switch and valve performance upon degraded instrument air pressure. Dresden Station committed to have the new procedures in place and all fail-safe pressure switches calibrated based on these new procedures by December 31, 1991. This letter presents an update on those activities.

The subject violation concerned Dresden's periodic calibration methodology of the fail-safe pressure switches. As stated in CECo's response to the violation, DIS-1600-11 accomplished the function of assuring that the subject valves would go to their fail-safe position before instrument air pressure had decayed to a point where there was no longer sufficient energy to re-position the valves. As required by procedure DIS-1600-11, the pressure at which the switch would trip was monitored to assure the associated valve moved to its associated fail-safe position. The normal switch setpoint was originally specified at 75 psi within DIS-1600-11. Later revisions to DIS-1600-11 modified the switch testing methodology. This was determined to be a contributing cause to the violation.

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For the new procedures, CECo consulted the valve and switch vendors to obtain the appropriate setpoint values and calibration frequencies. CECo has received and reviewed the results of the vendor information concerning the appropriate pressure switch setpoint values and calibration frequencies for Primary Containment Drywell/Torus Vent and Purge Valves, Reactor Building Ventilation System (RBVS) Isolation Dampers, and the Standby Gas Treatment System (SBGTS) Flow Control Dampers. Dresden Station has incorporated the appropriate pressure switch setpoint values and calibration frequencies into Station procedures. Dresden Station procedures DIS-1600-14, DIS-7500-05, and DIS-5700-01 have been written and approved for usage in the performance of the aforementioned pressure switch calibrations. The work packages created for the performance of the individual pressure switch calibrations were consistent with the finalized procedures as mentioned below.

Calibrations of the pressure switches for the RBVS Isolation Dampers and the SBGTS Dampers are complete as of December 31, 1991 on both Units 2 and 3. In addition, the calibrations of the pressure switches associated with the Unit 2 Drywell/Torus Vent and Purge Valves are complete as of December 31, 1991. These calibrations were performed using a work package consistent with the normal Dresden Station On-Site Review process. The pressure switch calibrations used setpoints provided by the valve and switch vendors. Unit 2 is presently in the Cold Shutdown condition in an extended forced outage, with Primary Containment integrity not required.

Calibration of the pressure switches for the Unit 3 Drywell/Torus Vent and Purge Valves will be performed prior to startup from the current extended refuel outage (D3R12) using a work package procedure. Due to outage-related activities, most valves are presently unavailable for testing. However, the pressure switches for valves A03-1601-60 and A03-1601-63 have been calibrated as of December 31, 1991. Unit 3 is presently in the Refuel condition with Primary Containment integrity not required.

If there are any comments or questions concerning this response, please contact me at (708) 515-7282.

Sincerely,

Milton H. Richter

for

Peter L. Piet
Nuclear Licensing Administrator

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

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