



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

January 30, 1992

CWS LTR #92-055

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

Licensee Event Report #92-01, Docket #050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(i)(b).

*L. F. Newer for 2/4/92*  
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/463)

9202110207 920130  
PDR ADDCK 05000237  
S PDR

100

*Handwritten signature/initials*

LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2/3						Docket Number (2) 0   5   0   0   0   2   3   7			Page (3) 1   of   0   4		
Title (4) 'A' Floor Drain Sample Tank Surveillance Interval Exceeded Due to Management 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)				
0	1	0	9	9	2	9	2	0	1	3	0	9	2	Dresden Unit 3	0   5   0   0   0   2   4   9

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

LICENSEE CONTACT FOR THIS LER (12)

Name Louis M. Kline, Regulatory Assurance Department							TELEPHONE NUMBER				
							AREA CODE				
							8   1   5		9   4   2   -   2   9   2   0		
Ext. 2709											

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)

Expected Submission Date (15)							Month	Day	Year
Yes (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO									

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

On January 6, 1992 at 0530 with Units 2 and 3 shut down, the Radwaste Operator began to fill the 'A' Radwaste Floor Drain Sample Tank ('A' FDST) with effluent from the 'A' Concentrator. Filling of the 'A' FDST was secured because of a steam leak to the Dearator Tank. During the next three days, difficulties were encountered with the Temporary Heating Boiler. Problems involving conductivity, level control, solids, and foaming with the 'A' Concentrator were also encountered. Due to the problems with the 'A' Concentrator, Radwaste Supervision lost track of the elapsed time since the 'A' FDST had been sampled as required by Technical Specification 4.8.D, i.e., 72 hours after filling. Radwaste Supervision realized that a sample was overdue for analysis approximately 30 minutes after the 72 hour surveillance period had been exceeded. Radwaste Supervision stopped filling the 'A' FDST and obtained a sample. The results of the sample were 2.3 E -5 micro-ci/ml (well within the Technical Specification activity limits). The cause of this event was an inadequate management control system (the time and date of starting to fill the 'A' FDST and when its sample was required was not communicated adequately from one crew to the next). Corrective actions for this event included implementation of an improved Radwaste activity management control system and counseling of the personnel involved. A previous event involving a missed tank sample was reported by LER 80-004/050010.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

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   2	-	0   0   1	-	0   0	0   2	OF	0   4	

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

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 Mwt rated core thermal power

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX)

EVENT IDENTIFICATION:

'A' Floor Drain Sample Tank [WD] Surveillance Interval Exceeded Due to Management Deficiency

A. CONDITIONS PRIOR TO EVENT:

Unit(s): 2(3)

Event Date: January 9, 1992

Event Time: 0530 Hours

Reactor Mode(s) N(N)

Mode Name(s): Shutdown(Shutdown)

Power Level(s): 0%(0%)

Reactor Coolant System (RCS) Pressure(s): 0(0) psig

B. DESCRIPTION OF EVENT:

At 0530 hours on January 9, 1992, with both Units 2 and 3 in cold shutdown, it was discovered that the Technical Specification 4.8.D sampling requirements of liquid Radwaste [WD] tanks had been exceeded. Although Technical Specification 4.8.D requires sampling and analysis of the Floor Drain Sample Tanks (FDSTs) within 72 hours after commencement of filling, the 'A' FDST sample analysis was inadvertently not initiated until approximately 72 hours and 30 minutes after filling had begun. Completion of the required analysis confirmed that the contents of the tank were well within the Technical Specification 3.8.D activity limits. Radwaste Supervision immediately notified the Operating Engineer in charge of Radwaste, and an investigation was then initiated by the Station Regulatory Assurance Department.

Investigation determined that although filling of the 'A' FDST had begun at approximately 0530 hours on January 6, 1992, a series of complex evolutions affecting liquid Radwaste operations had resulted in significant delays and interruptions in the filling process. This had resulted in Radwaste Shift Supervision losing track of the surveillance interval requirement. The significant delays/interruptions to the 'A' FDST filling process are listed below:

1. A temporary heating boiler being utilized to support Radwaste operations developed a dearator tank steam line leak, which required suspending the 'A' FDST fill process while repairs were completed. Subsequently, the heating boiler required replacement of a steam drum manway gasket, also requiring the 'A' FDST filling process to be suspended. The temporary boiler was being used while construction was being completed on the new permanent plant heating boilers.
2. Operational difficulties were encountered with the 'A' Radwaste Concentrator. Also contributed to delays in completing the 'A' FDST filling process. These difficulties included level control problems, conductivity spikes, solids, and foaming. The effluent from the concentrator was being routed to the 'A' FDST.

Review of the event with the Operators and Shift Supervisors involved concluded that the existing management control system concerning sample requirements did not provide for clear communication between shifts during an extended filling evolution of this type.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

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   2	-	0   0   1	-	0   0	0   3	OF	0   4	

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

C. APPARENT CAUSE OF EVENT:

This event is reported in accordance with 10CFR50.73(a)(2)(i)(b), which requires the reporting of any event or condition prohibited by the Technical Specifications.

As described in Section B above, complex evolutions in progress resulted in this event. Additionally, personnel error on the part of the Operators and Shift Supervisors was a contributing factor because they were aware of the requirement to complete the sample analysis but lost focus of this priority while resolving the operational difficulties that were causing delays and interruptions to the filling process. However, investigation concluded that the underlying root cause was an inadequate management control system concerning tracking of sample requirements during an extended fill evolution of this type. Therefore, the root cause of this event was attributed to management deficiency.

D. SAFETY ANALYSIS OF EVENT:

The safety significance of this incident was minimal in that the total curie content of the 'A' FDST was less than 0.01 curies based on a tank level of 71% and activity of 2.3 E -5. The maximum allowable total curie content for individual 2/3 Above Ground Storage Tanks is 0.7 curies per Technical Specification 3.8.D. The error in exceeding the 72 hour sampling interval was promptly discovered within approximately 30 minutes, and a proper sample was completed.

E. CORRECTIVE ACTIONS:

Each Shift Engineer has reviewed steps F1 and F2 of DOS 2000-1 (Unit 2/3 Radwaste Above Ground Storage Tank Surveillance), Revision 7, with all Equipment Attendants assigned to their shift. The SE steps require that when a tank fill is started, it must be placed on recirculation 64 hours from the time of addition and that tank sampling and analysis must be completed prior to 72 hours from the start of tank filling. Additionally, it was stressed that each Operator must maintain a questioning attitude when operating equipment in Radwaste due to the complexity of the Radwaste Systems.

The Operating Engineer in charge of Radwaste has developed a Radwaste Control Room Operator Shift Turnover Sheet. This turnover sheet provides information on the status of the Radwaste Tank Farm, in terms of the date and time for the following: when a tank was last sampled, when the initial fill started, and when a sample is required. Additional information has been included by the Operating Engineer in charge of Radwaste so that pertinent information concerning Radwaste will be available for the relieving crew upon crew relief.

Further review of the contributing factors involving the temporary heating boiler and the 'A' Concentrator concluded that they were related to the current extended outages of Units 2 and 3. This situation had resulted in the lack of normal nuclear steam inputs to the liquid Radwaste processes, particularly while the station heating boiler was being replaced and the temporary heating boiler was being utilized. The extended Unit 2 and 3 outages had also contributed to the 'A' Concentrator difficulties because of increased floor drain system inputs. As the Unit 2 and 3 outages and the new station heating boiler installation are completed, Radwaste operations will return to their normal configuration.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

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   2	-	0   0   1	-	0   0	0   4	OF	0   4	

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

F. PREVIOUS OCCURENCES:

LER/Docket Numbers    Title

80-004/050010    'A' Holdup Tank Not Sampled Within 72 Hours

During a unit outage while processing water into Unit 1 'A' Holdup Tank, operators checked the tank level after each addition, but did not sample the tank until 90% full. A period of 98 hours and 15 minutes had elapsed prior to sampling. This violated Technical Specification 4.8.D, which requires sampling every 72 hours. The tank was sampled and the activity was 0.012Ci. The involved personnel were instructed on careful examination of conditions and frequency for sampling tanks.

G. COMPONENT FAILURE DATA:

This section is not applicable because no component failure occurred.