



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 6, 1992

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

Attention: Document Control

Subject: Dresden Nuclear Power Station Units 2 and 3 Supplemental
Response to Notice of Violation Inspection Report
50-237/91016; 50-249/91015 NRC Docket Numbers 50-237
and 50-249

- References:
- (a) E. Greenman letter to Cordell Reed dated July 15, 1991.
 - (b) T.J. Kovach letter to NRC dated August 14, 1991
 - (c) E. Greenman letter to Cordell Reed dated October 4, 1991

Reference (b) provided Commonwealth Edison Company's (CECo) response to the subject Violation which was transmitted with the Reference (a) letter and Inspection Report. As a result of discussions between site engineering and the Senior Resident Inspector the supplemental information that you requested in reference (c) is supplied in the attachment.

If there are any questions or comments regarding this response, please contact Denise Saccomando Compliance Engineer, at 708/515-7285.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

Attachment

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

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Attachment

Response to NRC Request for Additional Information
INSPECTION REPORT 237/91016; 249/91015

ITEM:

1. Item 5 of the corrective actions that will be taken to avoid further violation states that the plant modifications program procedure DAP 5-1, will be revised by December 31, 1991. This appears to us to be excessively long. Since Unit 3 will be in a refueling outage with numerous design modifications to be implemented in September 1991, it was not clear what actions you have taken to assure that instruments being installed during the outage will be included in the calibration program.

RESPONSE:

An Assistant Technical Staff Supervisor completed a review of modifications installed during the Dresden Unit 3 Refueling Outage 12. This review will be documented in the Startup On-Site Review for Unit 3. No new instruments were identified requiring incorporation into the calibration program. The revision of DAP 5-1 is complete.

2. With regard to Item 6 of your corrective actions, you also indicated that an instrument data sheet program is expected to be completed by June 1992. It is not clear from your response as to whether the instruments found not to be in the instrument program will be included by June 1992.

RESPONSE:

Dresden station is currently developing an Instrument Setpoint Control Program. The program will include instruments identified through plant walkdowns, drawing review, Tech Spec review, Master Equipment List review, and reviews of existing calibration cards and station procedures. The program data base is expected to be completed by June 1992.

After the database is complete, the instruments will be reviewed to ensure that instruments required for safety system actuation are covered by a routine surveillance.

Should instruments be identified which are required for safety system actuation and are not covered by a routine surveillance they will be evaluated to determine their impact on system operability and appropriate actions taken. The appropriate surveillances, calibrations and procedure revisions will be performed by January 11, 1993.

3. Given the lack of procedural guidance and acceptance criteria associated with the reactor building differential pressure instruments (Important to Safety) and the electrical distribution system functional inspection (EDSFI) observations on some emergency diesel generator (EDG) instruments that had not been included in the calibration program, it appears to NRC Region III that the scope of the instrument data sheet program is too limited. Please evaluate our comments and concerns and provide an additional response in this regard.

RESPONSE:

The Instrument Setpoint Control program goal is to include all plant instruments. As this program will take several years to complete, the instruments have been prioritized according to their safety significance to ensure the maximum safety enhancement is achieved early in the program. Initially, the program will focus on safety related instruments, that is instruments which are required by Technical Specifications, Emergency Operating Procedures and other instruments whose failure would prevent the proper operation of a safety-related system.

The reactor building differential pressure instruments and the emergency diesel generator instruments mentioned above, were calibrated and added to the routine surveillance program. If additional instruments without proper calibration requirements are identified, they will be added to the program as appropriate based on their safety significance.