



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 11, 1992

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

Attention: Document Control

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Notice of Violation
Inspection Report 50-237/91039; 50-249/91043
NRC Docket numbers 50-237 and 50-249

References: (a) E. Greenman letter to Cordell Reed dated
February 11, 1992 transmitting NRC Inspection
Report 50-237/91039; 50-249/91043

Enclosed is Commonwealth Edison's response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited one Severity Level IV violation requiring a written response. The violation concerned the failure to maintain proper setpoints on the main steam line high radiation trip system.

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

Very truly yours,

P. L. Barnes for

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 NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/91039; 249/91043

VIOLATION

Technical Specification 3.1.A.1 requires that reactor protection system setpoints, and the minimum number of trip systems and minimum number of instrument channels that must be operable shall be as given in Table 3.1.1. Table 3.1.1 requires that two trip channels with two instrument channels each shall be operable for the main steam line high radiation trip function in all modes of operation and that the setpoint for this function be less than or equal to three times normal full power background.

Contrary to the above, on August 20, 1991, the setpoints in the "hydrogen addition on" mode were greater than three times normal full power background for both instrument channels of both trip systems, and the required actions were not performed.

REASON FOR THE VIOLATION

On August 20, 1991, an Instrument Mechanic (IM) was performing the quarterly calibration surveillance of the Unit 2 main steam line radiation monitors using Dresden Instrument Surveillance (DIS) 1700-1, "Unit 2 Main Steam Line Log Radiation Monitoring System Calibration." During the surveillance, the IM was distracted by questions from an evaluator. The IM inadvertently filled in the data sheet with the previous quarter's setpoint rather than the current data. The IM's shift ended in the middle of the surveillance and the completion of the surveillance was left for the next shift. The on-coming IM noticed that the data had already been filled in, and proceeded to use the previous quarter's data for the completion of the surveillance. This resulted in the setpoints for the Unit 2 Main Steam Line Log Radiation Monitors, when hydrogen addition is on, being set in a non-conservative direction. The set points with the hydrogen addition off were acceptable. The following day, the Instrument Maintenance Department's surveillance coordinator discovered the error during a review of the surveillance.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Upon discovery of the error, the operations department was notified and the hydrogen addition was secured. The Main Steam Line Radiation Monitor Setpoint Selector Switches were placed to the OFF position. The setpoints with the hydrogen addition off were acceptable. This allowed the station to be in compliance with Technical Specifications. DIS 1700-1 was performed and the setpoints were changed to the proper value.

The data sheet for DIS 1700-1 was revised to clarify previous and present setpoint data. This procedure revision was issued for use on October 11, 1991.

A tailgate training session was held with the IM department on this event, reiterating the need for attention to detail.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

Surveillance procedures, DIS 1700-1 (Unit 2) and DIS 1700-5 (Unit 3), will be enhanced. The individual performing the surveillance will be instructed to complete the calibration and obtain supervisory review and acceptance of the data on one channel before proceeding to the next channel. This will reduce the likelihood that errors will carry over between instrument channels during the performance of the surveillance. An independent verifier will review and approve all calculations and data transfers performed. This procedure revision is expected to be issued by April 10, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the Main Steam Line Radiation Monitor Setpoint Selector Switches were placed in the OFF position, thereby complying with the Technical Specification limit.