



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

April 10, 1992

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
 Supplemental Response to Notice of Violation
 Inspection Report 50-237/91033; 50-249/91036
 NRC Docket Numbers 50-237 and 50-249

References (a) H. Miller letter to Cordell Reed dated
 February 6, 1992, transmitting NRC
 Inspection Report 50-237/91033;
 50-249/91036

Commonwealth Edison company (CECo) responded by reference (b) to the Notice of Violation (NOV) which was transmitted with the reference (a) letter and Inspection Report. Based on a review by Mr. Ron Langstaff from NRC Region III, additional information was requested on the process for identifying, documenting, and correcting adverse conditions during surveillance activities. Supplemental information is provided in the Attachment.

If you staff has any questions or comments concerning this letter, please refer them to Perry Barnes, Compliance Supervisor at (708) 515-7278.

Sincerely,

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

SUPPLEMENTAL INFORMATION IN RESPONSE TO
INSPECTION REPORT 50-237/91033; 50-249/91036

Surveillance procedure DTS 1600-6 "Drywell Liner Leakage Inspection," Rev. 0 was initiated in September 1987. This procedure directed that "if any abnormal conditions are noted, notify Technical Staff Supervisor of abnormality and initiate work request(s) for repairs (if necessary)." In retrospect, the procedure failed to specifically quantify/define "abnormal conditions."

In August 1988, CECO transmitted its Final Report on the Potential for Drywell Steel Degradation at the Sand Pocket, Dresden Units 2 and 3 and Quad Cities Unit 1 and 2. This report discussed surveillance procedures as a preventative action and identified that "Any evidence of leakage through any of the drain lines constitutes an abnormal condition to be reported and for corrective measures to be initiated." Dresden Station did not revise surveillance procedure DTS 1600-6 to reflect this definition of abnormal conditions.

The Procedures Upgrade Program Writers Guide, approved in February 1989, provides definitive direction on formatting surveillance procedures. Surveillance procedures are to describe acceptance criteria or a correlation to steps containing acceptance criteria. Acceptance criteria are those specific items that must be met to verify that a system or component is operable or to verify that regulatory requirements are met. Additionally, actions required, if acceptance criteria are not met, should also be included.

The current schedule for the Procedures Upgrade program shows completion in September 1993. Approximately 40% of the station procedures have been upgraded under this program.

A testing procedure coversheet is used when performing surveillance activities. This coversheet includes a review by the Cognizant Supervisor and Shift Supervisor to evaluate test results and to check whether the test is satisfactory. If the test is not satisfactory (i.e., acceptance criteria are not met), corrective actions are initiated and documented on the coversheet. For example, a work request could be written for repair, or a Deviation Report (DVR) initiated to investigate the problem.

The current Dresden programs where surveillance procedures specify acceptance criteria, combined with a supervisory review of test results assures that conditions adverse to quality are promptly identified and corrected.