



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 15, 1992.

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 1 and 2 Supplemental
Response to Notice of Violation Associated with
Inspection Report 50-237/91016; 50-249/91015
NRC Docket Numbers 50-237 and 50-249

- References:
- (a) E. Greenman letter to C. Reed dated July 15, 1991,
transmitting NRC Inspection Report
50-237/91016; 50-249/91015
 - (b) T. J. Kovach letter to USNRC dated August 14, 1991,
transmitting initial response to NRC Inspection
Report 50-237/91016; 50-249/91015
 - (c) E. Greenman letter to C. Reed dated October 4, 1991,
requesting supplemental information to response
to NOV identified in NRC Inspection
Report 50-237/91016; 50-249/91015
 - (d) T. J. Kovach letter to USNRC dated February 6, 1992
transmitting additional information to response
to NOV identified in NRC Inspection Report
50-237/91016; 50-249/91015

Enclosed is a Commonwealth Edison Company (CECo) supplemental response
to the Notice of Violation (NOV) transmitted by the Reference (a)
report. The attached response supersedes the previous response
transmitted with Reference d.

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

Sincerely,

P. L. Barnes
for

T. J. Kovach
Nuclear Licensing Manager

Attachment

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

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Attachment

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

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 has been 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:

Item 6 of "The Corrective Steps that Will Be Taken To Avoid Further Violation" in reference b, was intended to state that Dresden Station is currently developing an Instrument Data Sheet Program which will be completed during the third quarter of 1992. This program encompasses all instruments identified during walkdowns and document reviews. As part of the document review, the Master Equipment List (MEL) was compared to the surveillance program. One instrument was identified in the MEL as functionally safety related, but had not been included in the surveillance program. This instrument has been placed into the General Surveillance Program (GSRV).

We are currently performing an indepth Technical Specification review and validation to include all instruments implicitly or explicitly required to comply with the Technical Specifications. Some of the instruments identified during this review are conformance instruments. Conformance instruments are used to acquire data during a surveillance procedure to indicate compliance with the Technical Specifications. If a conformance instrument is determined to be a safety related component, it will be included in the GSRV program and an error analysis performed. If it is nonsafety related, an error analysis will be performed, and the results of this analysis incorporated into the existing surveillance program. Provisions will also be made to insure the conformance instruments are within calibration tolerances.

This Technical Specification Review will be completed by August 1, 1992. At that time, the NRC will be updated with the schedule to complete the surveillances, calibrations, and procedures for these instruments. The schedule will be dependent upon the number of instruments identified by August 1, 1992.

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 Program is one element of the Corporate Setpoint Control Program and contains two parts, the Instrument Data Sheet Program and the Calculation Program. The Instrument Data Sheet Program consists of developing standardized CECO instrument data sheets and backfitting this information at all six sites. For Dresden, a complete plant walk down was performed to ensure that all instruments are identified in the data sheet program. Additionally, a document review was performed to validate the walkdown results. The Instrument Setpoint Program timetable for Dresden shows completion of the Data Sheet Program during the third quarter 1992. Corporately, the Data Sheet Program is 66% complete and 87% complete at Dresden.

The second part of the Instrument Setpoint Control Program will ensure calculations exist to support the setpoints identified during the Instrument Data Sheet Program. The instruments are classified into four categories: safety related, regulatory related, reliability related and non-safety related. While conformance instruments are not a specific category delineated in the program, they will be addressed as part of one of the these major categories. The Calculation Program has been initiated at Dresden. A priority for validating calculations was established based on safety significance, with Reactor Protection System and other protective instrumentation included in the Technical Specifications having the highest priority. A scheduled completion date of December 31, 1992, has been established for this scope. Other safety related, regulatory, reliability and non-safety related instrument calculations will be validated based on an evaluation of the current condition of the calculations and any performance based concerns.

It should be noted that we are evaluating numerous devices under the setpoint control program (fuses, overloads, relays, etc.) to determine which devices require near term attention and relate to performance based problems, versus those which have sufficient design documentation and control. We would be pleased to provide annual updates to your staff defining our milestones, program scope and results.