



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 8, 1992

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Notice of Violation
Inspection Report 50-237/92007; 50-249/92007
NRC Docket Numbers 50-237 and 50-249

Reference: L. Greger letter to C. Reed dated
April 10, 1992, transmitting NRC Inspection Report
50-237/92007; 50-249/92007

Enclosed is Commonwealth Edison Company'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 concerns the lack of acceptance criteria in a Radwaste Operating Procedure. Our response to the cited violation is provided in the attachment.

Dresden Station is sensitive to the recent number of contamination control problems which resulted while handling contaminated systems. To fully address this issue, the station is developing an action plan on the overall controls for operating contaminated systems. This plan will address current policies and procedures, possible equipment deficiencies, command and control of radwaste transfers, and the training on these policies, programs, and processes.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Sincerely,

A. R. 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
50-237/92007; 50-249/92007

VIOLATION (237/92007-02)

10 CFR 50 Appendix B, Criterion V, as implemented by Commonwealth Edison Company's Quality Assurance Program, requires in part, that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above, on March 1, 1992, Dresden Operations Procedure (DOP) 1200-05, "Reactor Water Clean-Up System Demineralizer Operation," Revision 7, did not include appropriate quantitative or qualitative acceptance criteria for the amount of resin that could be transferred from the demineralizer to the spent resin tank.

REASON FOR VIOLATION

On March 1, 1992, a Reactor Water Cleanup (RWCU) demineralizer resin bed was transferred to a Radwaste Spent Resin Tank (SRT). Prior to the transfer, a discussion was held between the Radwaste Shift Supervisor (RWSS) and the Unit 2 Shift Supervisor (U2SS). The RWSS emphasized a need to stop the resin transfer when the SRT indicated level reached 95% to prevent a possible overflow of the SRT. The 95% limit had been used as a general upper limit to prevent overflow. The procedure used for the transfer, DOP 1200-05, "Reactor Water Clean-Up System Demineralizer Operation," did not include a documented transfer limit.

The SRT level indicated 80% before the beginning of the resin transfer. The transfer commenced and continued until the SRT level indicated 95%. At this point, the transfer site glass indicated that resin was still in the transfer pipe. The dose rate on the transfer pipe was approximately 12 R/hr. Rather than stop the transfer at that point, leaving high area dose rates and possibly plugging the transfer pipe, the U2SS elected to continue the transfer until the transfer site glass indicate minimal resin in the transfer pipe. When the SRT indicated level reached 98%, the sight glass had started to clear and the dose rate was down to approximately 100 mR/hr. At this time, the resin transfer was stopped. The SRT indicated level continued to rise to greater than 100%, then slowly settled out at about 98.5%

The RWSS did not suspect that the SRT had overflowed. The U2SS was cognizant that the SRT indicated level had exceeded 100%, but did not suspect an overflow because the tank room sump pumps did not turn on. Subsequent airborne contamination problems lead to a visual inspection of the SRT Room, where approximately 50 gallons of resin slurry was observed on the floor.

An investigation of the event determined that DOP 1200-05, "RWCU System Demineralizer Operation," was inadequate in that limits were not placed on the tank level before and during the transfer. By design, the SRT can only be decanted down to 80%, leaving an available volume of approximately 2500 gallons. Calculations indicate transfer of a Radwaste Clean-up bed or Fuel Pool Demineralizer bed amounts to a total volume of about 3000 gallons of resin/water slurry and flush water. A new procedure, DOP 2000-112, "Transfer Water from Spent Resin Cleaner Sludge Tank Using Portable Air Operated Pump," had been recently issued to provide a mechanism for operations to decant the tank to or below 70% (this would provide a total available volume of approximately 3750 gallons). This procedure was not implemented for this evolution.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The RWSS and the U2SS were counseled by an Operating Engineer as to the importance of a questioning attitude and the need to follow-up on any indication that is other than expected.

DOP 1200-05, "RWCU System Demineralizer Operation," and DOP 1900-08, "Fuel Pool Demineralizer Resin Transfer," have been revised to include a statement requiring that the SRT level must be at a maximum level of no more than 70% prior to transferring a Reactor Water Clean Up (Fuel Pool) Demineralizer bed to the SRT. A precaution statement was also added to these procedures requiring a resin transfer to be stopped immediately when the SRT indicated level reaches 94%. On April 30, 1992, a resin transfer from the Fuel Pool Cooling Demineralizer bed to the SRT was successfully performed using the revised procedure.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

A letter signed by the Assistant Superintendent of Operations was issued to Shift Engineers, Licensed Shift Supervisors and Radwaste Shift Supervisors outlining the Heightened Level of Awareness (HLA) activities that are required for resin transfers from the reactor building to radwaste. Some of these HLA activities include: 1) designating the RWSS as having overall control of the transfer, 2) a review of the procedure to be used with emphasis on the precautions, limitations, and actions, 3) the method of communications to be used to control the operation, and 4) expected results and the potential consequences of overflowing the SRT or stopping the transfer prior to all the resin being transferred.

This event and procedure DOP 2000-112, "Radwaste Waste Demineralizer Resin Transfer," will be reviewed with Operating Personnel in their continuing training cycle. This training will be completed by September 30, 1992.

Operations will develop an action plan addressing the overall controls for operating contaminated systems. This plan will address radwaste procedures, adherence to procedures, command and control of radwaste transfers, possible equipment deficiencies (tank level indicators), review of current policies on the transfer of contaminated materials and training on these policies, programs, and processes. This action plan will be developed by July 31, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved with issuance of revised station procedures DOP 1200-05 and DOP 1900-08 on April 2, 1992.