



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 5, 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 50-237/92005; 50-249/92005
NRC Docket Numbers 50-237 and 50-249

References: B. Clayton letter to C. Reed dated May 6, 1992,
transmitting NRC Inspection Report
50-237/92005; 50-249/92005

Enclosed is Commonwealth Edison Company's (CECo) 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 references examples of concerns with inadequacy of procedures and procedural adherence. CECo's response is provided in the attachment.

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

Sincerely,

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
50-237/92005; 50-249/92005

VIOLATION: (237/92005-02)

10 CFR 50 Appendix B, Criterion V, "Procedures, Instructions, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instruction, procedures or drawings.

Contrary to the above:

- a. On February 11, 1992, an operator performed an activity affecting quality, placement of a lock on the electrical breaker for containment isolation valve 2-1301-1, without a documented instruction or procedure.
- b. As of February 11, 1992, DAP 07-32, " Routine Plant Testing Activities," a procedure governing activities affecting quality, did not prescribe any measures to indicate the status of components tested under its administrative control.
- c. On April 4, 1992, personnel failed to accomplish an activity affecting quality in accordance with a prescribed procedure in that critical drawing M-359 was not updated to reflect installation of temporary instrumentation within one day of installation as stated in DAP 07-04 Step F.1.f(5).
- d. As of March 8, 1992, the Unit Operators Daily Surveillance Log, was inadequate in that it failed to prescribe checking of air samples for reactor coolant leakage in accordance with Technical Specification 4.6.D, an activity affecting quality, although it was the procedure designated to meet the surveillance requirements.
- e. On March 7, 1992, operators failed to accomplish an activity affecting quality in accordance with a prescribed procedure in that the diesel generator was not operated loaded for five minutes as required by step I.7.a of DOS 6600-03, "Bus Undervoltage and ECCS Integrated Functional Test For Unit 2/3 Diesel Generator (Unit 3 Test Only)".

Reason For The Violation (Violation 237/92005-02a)

Dresden Administrative Procedure (DAP) 03-05, "Out-Of-Service and Personnel Protection Cards," implements Commonwealth Edison Company's Production Instruction 1-3-A-1, "Out-Of-Service Cards." DAP 03-05 states it is to implement but not supersede the Production Instruction.

The Production Instruction states: "When Generating Station equipment, which is not under the jurisdiction of the Load Dispatcher, is to be taken out of service, a Master Out of Service Card (and related Out of Service Cards, if required), must be placed on the main switch, main valve, and other devices which will isolate the equipment. Where it is possible for persons other than this Company's employes to operate the isolation devices, additional precautions will be taken, as necessary, to prevent unauthorized operation."

Locks have occasionally been placed on electrical equipment to provide an additional barrier against personnel injury. This complies with Production Instruction statement that "additional precautions will be taken, as necessary, to prevent unauthorized operation." Dresden realizes that these locks, placed on breakers as additional caution, may not have been adequately controlled.

Corrective Steps Taken and Results Achieved

A temporary procedure change to DAP 03-05 has been implemented to control placement of locks on electrical breakers.

Corrective Steps Taken to Avoid Further Violations

A permanent revision to DAP 03-05 incorporating the improved control of locks will be completed by August 30, 1992.

Electrical Maintenance Department Personnel will receive tailgate training on the DAP 03-05 revision by June 30, 1992.

Date When Full Compliance Will Be Achieved

Full compliance was achieved with the implementation of the temporary procedure change to DAP 03-05.

Reason For The Violation (Violation 237/92005-02b)

During the performance of VOTES testing, the practice has been to inform the control room of the intent to perform the test, and proceed with the test only after approval had been received from the appropriate control room supervisory personnel. VOTES testing requires the valve to be temporarily removed from service temporarily while test equipment is being attached or removed. The valve is then immediately returned to service. Valves undergoing VOTES testing were not identified in the control room.

Corrective Steps Taken and Results Achieved

A temporary procedure change to DAP 7-32 has been issued to include requirements to identify valves being tested by the VOTES programs. This change will be reviewed with Operations personnel by June 15, 1992.

Corrective Steps Taken to Avoid Further Violations

A review of other testing activities will be performed in order to identify other situations where regulatory compliance is not being met. This review will be completed and an action plan developed by August 31, 1992.

DAP 07-32 will be permanently revised by September 30, 1992.

Dresden Electrical Procedure (DEP) 040-10, "VOTES Testing Procedure," will be revised to ensure that the breaker is tagged to identify that it is being tested. This procedure will be revised by September 30, 1992.

Date When Full Compliance Will Be Achieved

Full compliance was achieved with the issuance of the temporary change to DAP 7-32.

Reason For The Violation (Violation 237/92005-02c)

Dresden Administrative Procedure (DAP) 07-04, "Control of Temporary System Alterations," requires that a critical drawing change be made upon installation of a temporary alteration. When the temporary alteration for the installation of diagnostic equipment on the isolation condenser was initiated, the system engineer marked on the proper form that critical drawings should be updated. After the installation of the diagnostic equipment, the Station Control Room Engineer, per procedure, contacted the system engineer to update the drawings. When the system engineer reviewed the drawings, it was noted that the installed, original design connection points, for connection of the temporary instrumentation, were not shown on the drawings. Because these original points were not shown, the system engineer erroneously concluded that the temporary alteration did not need to be shown on the critical drawing.

Corrective Steps Taken and Results Achieved

The critical drawings have been updated to reflect the temporary alteration.

Corrective Steps Taken to Avoid Further Violations

This event was reviewed and discussed in detail with the system engineer involved. The expectations for procedure adherence were restated and re-emphasized. This event was also reviewed during a tailgate training session with the system engineers on the Technical Staff.

The as-built drawing will be updated by September 30, 1992, to reflect the original connection points associated with the temporary alteration.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the updating of the critical drawing to reflect the temporary alteration.

Reason For The Violation (Violation 237/92005-02d)

Discussion with the Dresden Station's NRC Senior Resident Inspector identified that a misinterpretation exists within the operating staff as to the applicability of the numbers used in the containment venting procedure and the surveillance associated with the drywell air sample. Dresden Operating Procedure (DOP) 1600-01, "Normal Venting of the Drywell Torus," provides operations with upper limits of containment air activity (1.8 E-7 microcuries/cc) for reactor building ventilation and (2.1 E-5 microcuries/cc) for standby gas treatment that are to be used to determine venting. The Unit Operator's Daily Surveillance Log that is used for documenting the drywell air sample provides operations with an upper limit for air sample activity (1.5 E-8 microcuries/cc). If sample results exceed this limit, additional actions are required. Discussions between the NRC Inspectors and operating personnel identified that the operating personnel believed the number 1.5 E-8 microcuries/cc related to venting requirements rather than drywell air sampling. Therefore, it was believed that there was no acceptance criteria associated with drywell air sampling because it was believed that the number 1.5 E-8 microcuries/cc was related to the venting process.

Corrective Steps Taken and Results Achieved

A temporary procedure change was made Unit 2(3) Operator Surveillance Log Appendix A to clarify the actual technical specification requirement being met by the daily containment air sample.

Corrective Steps Taken to Avoid Further Violations

The above Unit 2(3) Operator Surveillance Log Appendix A temporary change will be made into a permanent revision by September 30, 1992.

Tailgate training for operating personnel will be conducted by June 30, 1992, emphasizing the relationship between the containment air sample and the identification of reactor coolant leakage.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved with the issuance of the above temporary procedure change.

Reason For The Violation (Violation 237/92005-02e)

On March 7, 1992, while performing Dresden Operating Surveillance (DOS) 6600-03, "Bus Undervoltage and ECCS Integrated Functional Test for Unit 2/3 Diesel Generator (Unit 3 Test Only)," test personnel did not accurately measure the loaded run time of the diesel generator. The stop watch had already accumulated 10 seconds prior to the start of the first pump (3A LPCI pump). Therefore, this pump run time was 10 seconds short. At the completion of the test it was believed that the five minute run time was performed and procedural adherence achieved. Test personnel became involved with equipment problems after the test was secured, and they subsequently did not have an immediate opportunity to review the process computer data output. A subsequent review of the process computer data by the NRC indicated that the diesel was unloaded 10 seconds short of the required time for one pump and 3 seconds for another pump.

Corrective Steps Taken and Results Achieved

On March 21, 1992, Special Procedure 92-3-57, "Bus Undervoltage and ECCS Integrated Functional Test for Unit 2/3 Diesel Generator (Unit 3 Test Only)," was successfully performed. This test verified 2/3 diesel generator operation for greater than five minutes while it was loaded with the emergency loads, and the 2/3 diesel generator auxiliary equipment feeds transferred to Unit 3.

The individuals involved in this event were counselled by an Operating Engineer on the importance of verifying satisfactory results in a timely manner.

Corrective Steps Taken to Avoid Further Violations

The procedures governing this test for the diesel generators (DOS 6600-3 thru 6) will be revised to include a required sign off for the verification of the diesel generator 5 minute run based upon the review of the process computer print out. Additionally, a designated individual will assume the responsibility of monitoring the time interval from when the last ECCS pump auto starts, until the five minute diesel load time is complete. These procedure changes will be completed by January 31, 1993, prior to the next required test.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 21, 1992, with the successful completion of the Special Procedure.