



Commonwealth Edison
Dresden Nuclear Power Station
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June 1, 1992

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road - RIII
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3 Supplemental Information to Response to Notice of Violation and Proposed Imposition of Civil Penalties Identified in Inspection Reports
50-237/91027; 50-249/91028, 50-249/91032, 50-237/91032;
50-249/91035, 50-237/91035; 50-249/91038
NRC Docket Numbers 50-237 and 50-249

Reference: T. Kovach letter to J. Lieberman dated February 7, 1992

The referenced letter transmitted Commonwealth Edison's (CECo) response to the Notice of Violation identified in the subject Inspection Reports. The response to Violation III.A states, "The work request process will be reviewed to ensure appropriate criteria are in place to trigger a minor plant change when required. Necessary procedure changes are expected to be made and training completed by May 31, 1992. This review will also include a focused retrospective sampling of work requests."

A retrospective review of a sample of past work requests was performed to determine whether a programmatic concern existed for the categorization of work requests as minor design changes. The sample initially focused on secondary containment work but was later expanded to also focus on primary containment work. This review identified one discrepancy in the categorization of a work request to remove the X Area from secondary containment and one discrepancy in the categorization of a work request for a containment penetration cover. Discrepancy Records were written and are being processed for these two work requests.

A review was also performed to determine whether a programmatic concern existed for the adequacy of criteria for processing a work request as a minor design change. The review found that the criteria used for design, structural changes and materials were generally consistent among the six CECo nuclear generating stations which adhere to Quality Procedure (QP) 3-51, Attachment A, "Definition of a Modification and Phases of Testing. Dresden procedures were found to comply with QP 3-51, Attachment A." The review also found that on an infrequent basis the criteria are not entirely clear for whether a change is a minor design change or a modification. These cases have normally needed a review by personnel experienced in the minor design change and modification process. Based on this review, no procedure changes were made.

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In an effort to clarify this process, Commonwealth Edison formed a task force to review criteria for minor design changes. The task force is developing recommendations for simplifying and refining the criteria and associated paperwork. The task force is also considering qualifications for personnel who categorize work requests as a minor design change or modification. The task force recommendations will be completed by July 31, 1992. Dresden Station will review these recommendations and develop an implementation plan by September 25, 1992.

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

Sincerely,

P. R. Barnes for
T. J. Kovach
Nuclear Licensing Manager

cc: USNRC Document Control Desk
B. L. Siegel, Project Manager, NRR
W. G. Rogers, Senior Resident Inspector, Dresden