



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137
OCT 21 1992

*Jim Dyer
ACTION*

*50-237
50-249*

MEMORANDUM FOR: John A. Zwolinski, Assistant Director for RIII Reactors,
NRR

FROM: Edward G. Greenman, Director, Division of Reactor Projects

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE (TASK INTERFACE AGREEMENT)
FOR DRESDEN STATION - STANDBY GAS TREATMENT SYSTEM AS-FOUND
SURVEILLANCE TESTING (AITS #92-0616)

In the attached memo, Walt Rogers, SRI, Dresden, identifies an issue with the testing of adsorbers at the Dresden site. While the licensee is committed to American National Standard (ANS) N18.7-1972 which requires the recording of the as-found condition during surveillance testing, no such requirement is in the procedural guidance for ANSI N510-1975. ANSI N510-1975 was adopted in association with a Technical Specifications change in 1976.

While we agree that no violations of Technical Specifications occurred, we are concerned because without as-found testing, it is impossible to judge whether the adsorbers are performing their function over an extended period of time due to gasket degradation, media shifts, and mechanical damage to the canisters. Our experience has been that the as-found testing of instruments, pumps, etc. have been invaluable in determining adverse trends in equipment performance.

While no gross leakage was detected in the 1991 testing of adsorber canisters at Dresden, it would appear that some periodic tests should be performed to determine that a safety problem does not exist.

Since there have been past regulatory inconsistencies with regard to as-found adsorber tests, a backfit analysis would be required to impose testing. RIII believes a backfit analysis should be performed to determine if the safety significance of the issue requires that some as-found testing of adsorbers be done at specified intervals.

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PDR ADOCK 05000237
P PDR

ADD: Bryan Siegel

*W.A. Encl.
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*Memo
DFOI*

John A. Zwolinski

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OCT 21 1992

Should you have any questions, contact R. C. Knop of my staff at (708) 790-5547.

William L. Stone
for Edward G. Greenman, Director
Division of Reactor Projects

Attachment: As stated

cc w/attachment:

H. J. Miller

C. E. Norelius

W. G. Rogers, SRI

TSS

DRP Division Directors, RI, RII, RIV, RV

September 28, 1992

MEMORANDUM FOR: R. C. Knop, Chief, Reactor Projects Section IB

FROM: Walt G. Rogers, Senior Resident Inspector
Dresden Nuclear Power Station

SUBJECT DRESDEN STATION - STANDBY GAS TREATMENT SYSTEM AS-FOUND
SURVEILLANCE TESTING

Dresden Technical Specifications (T/S) require the standby gas treatment system (SBGTS) charcoal absorber leakage bypass test to be periodically preformed. On May 17, 1991, the "B" train SBT failed multiple bypass tests following maintenance on the absorbers. The licensee contributed the failures primarily to degradation of the absorber canister gaskets. An "As-found" leakage bypass test was subsequently preformed on the "A" SBGTS train on May 19. Again, the T/S acceptance criteria was not met. After the canister gaskets were replaced and the absorber door mechanism was repaired the "A" train acceptance criteria was met.

An NRC inspection revealed the May 19 test was the only time "As-found" testing had been preformed on either SBGTS trains. The licensee is committed to American National Standard (ANS) N18.7-1972. N18.7-1972, Section 6.4, "Test and Inspections After Startup", requiring surveillance procedures to record the "As-found" condition during testing. However, a November 17, 1976, Dresden Safety Evaluation, associated with changes to the SBGTS system T/S, indicated the licensee was required to preform the bypass test in accordance with the procedural guidance provided in the American National Standard (ANSI) N510-1975. ANSI N510-1975, Section 12.1, "Purpose," allows the bypass leakage test to be performed following filter train reassembly if samples of absorbent are to be taken for laboratory analysis. Additionally, discussion with Region III, Division of Reactor Safety staff members, indicated enforcement of the ANSI N18.7 "As-found" testing requirements may not be appropriate due to past regulatory inconsistencies.

Commonwealth Edison Company's (CECo) position is that "As-found" testing of the charcoal absorbers is not required per the guidance provided in ANSI N510-1975. Also, no "As-found" charcoal absorber bypass testing is currently performed at the other five sites. The resident staff believes the "As-found" testing requirement of ANSI 18.7-1972 supersedes the procedural guidance outlined in ANSI N510-1975. This issue is an unresolved item in inspection report 50-237/92020(DRP) and 50-249/92020(DRP).

Please provide appropriate regulatory guidance as to the enforceability of the "As-found" testing requirements per ANSI 18-7 for the charcoal absorber trains used at CECo facilities.


Walt G. Rogers, SRI
Dresden Nuclear Power Station

cc: Bruce Burgess, DRS, RIII