



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 4, 1993

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

Attn: Document Control

Subject: Dresden Nuclear Power Station Units 2 and 3
Supplemental Information with Regards to Response to
Notice of Violation associated with
Inspection-Report 50-237/91016;50-249/91015
NRC Docket Numbers 50-237 and 50-249

Reference: T.Kovach letter to USNRC dated April 15, 1992,
transmitting supplemental information in response
to subject Notice of Violation.

The reference letter addresses an annual update which will be
provided to the Nuclear Regulatory Commission on Commonwealth
Edison's Corporate Setpoint Control Program. Attached is an
update for 1992. If you have any questions concerning this,
please contact Denise Saccomando, Regulatory Performance
Administrator at (708) 663-7285.

Sincerely,

Dennis L. Farrar
Regulatory Services Manager

attachment

cc: A.B. Davis, Regional Administrator, R III
J. Stang, Project Manager, NRR
M. Leach, Senior Resident Inspector, Dresden Station

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Setpoint Control

Description:

During a 1987 corporate evaluation, INPO identified weaknesses in Edison's control of setpoint data, particularly with respect to instrumentation. At that time, CECO initiated a setpoint control program, with its initial emphasis on plant instrumentation.

The current Instrument Program consists of:

- The program goal is to establish a standardized, consistent computer Instrument Database, with supporting documentation and appropriate control procedures, implemented consistently at all six stations. Backfit the information contained in the database.
- Expand the development of the protective relay database in the DB2 environment to include all devices. Develop a shell database structure void of data. Develop the same structure in a PC format for data acquisition.
- Integrate the setpoint databases with EWCS (Electronic Work Control System).
- Develop a plan to integrate existing programs that anticipate performing walkdowns and/or document reviews. This will maximize the data gathering efforts and minimize resources and cost.
- Developing procedures and guidelines to control the database structure, the information in it, and the methodology for performing the supporting setpoint error analysis.
- Developing a company policy to determine which instruments require setpoint error analysis.
- Performing or verifying analysis to justify setpoints and channel accuracies found during database accumulation. Focus instrument setpoint error analysis effort to Technical Specification functions and reassess need for additional analysis or verification.

Status - Instrument: (As of December 31, 1992)

Database

- Development is complete for By/Bw/Z/QC/D, with LS expected to be completed by 2nd quarter 1993.
- Initiated work on printing datasheets and test reports.

Error Analyses

- TIDs for setpoint/loop accuracy analyses issued
- TID for scaling in progress, issued for initial comment - 12/92
- Acquisition of calculations from AEs in progress, expected completion by 6/93

Procedures

- Control of data elements and database structure issued
- Processing of setpoint change request in final approval
- Database change request and NOD MA.10 out for final comments

PWR Error Analyses

- Instrument classifications complete, NSSS RPS/ESF analyses complete, other Tech. Spec. and EOP analyses in progress with an estimated completion of 12/93.

BWR Error Analyses

- Instrument classifications complete for D/QC, Tech. Spec. RPS/ESF analyses complete for QC and D, other Tech. Spec. analyses in progress for QC and D. Completion expected by 12/93.
- No work initiated on LSCS due to priority action based on completing mature plants first. Work to start in 1993.

Labeling/DCRs

- In progress for D/QC, not initiated for LSCS due to mature plant priorities.

Status - Thermal Overloads, Relays, Molded Case Circuit Breakers: (As of December 31, 1992)

- The name of the program has been changed to "Control of Engineering Data System" (COED) to properly reflect the functionality being built into the system.
- Database modeling completed, structure development in progress
- PC based system for data acquisition in progress
- No data collection, analyses, or procedures revisions initiated pending acceptance of strategy revision and development of integrated plant walkdowns schedules.
- Software development for implementation of appropriate design controls is in progress.