



**Commonwealth Edison**  
 1400 Opus Place  
 Downers Grove, Illinois 60515

June 24, 1993

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

Attention: Document Control Desk

**Subject:** Dresden Nuclear Power Station Units 2 and 3 Response to  
 Inspector Followup Item Inspection Report 50-237/93012; 50-  
 249/93012 NRC Docket Numbers 50-237 and 50-249

**Reference:** Brent Clayton letter to L.O. DelGeorge, dated May 26, 1993,  
 transmitting Inspection Report 50-237/93012; 50-249/93012.

Enclosed is Commonwealth Edison Company's (CECo) response to Inspector  
 Followup Item 50-237/93012-01 as requested in the referenced letter. The  
 response is provided as an attachment to this letter.

Additional clarification is also provided for the second observation noted in  
 Section 4.b of the referenced NRC inspection report. The report cites a "non-  
 conservative operational decision" regarding "Unit 2 core alterations and the  
 restart of Unit 3 with an inoperable main control room emergency ventilation  
 system." Contrary to this statement, the control room emergency ventilation  
 system was functional. Dresden Station does not currently have Technical  
 Specifications governing control room emergency ventilation operability, therefore  
 the use of the word "inoperable" is inappropriate in this context. The radioactive  
 effluent filtration capability of the control room emergency ventilation system  
 remained functional. Dresden Station made a conscious decision to remove the  
 Containment Cooling Service Water (CCSW) system from operation to perform  
 maintenance that would ensure the long term availability of the CCSW system for  
 the removal of control room and containment heat. Dresden maintains that the  
 proactive maintenance performed on CCSW to increase reliability was farsighted  
 and beneficial.

If your staff has any questions concerning this letter, please refer them to  
 Denise Saccomando, Compliance Engineer at (708) 663-7285.

Sincerely,

D. Farrar  
 Nuclear Regulatory Services Manager

290043

attachment

cc: J. B. Martin, Regional Administrator Region III  
 J. Stang, Project Manager, NRR  
 M. N. Leach, Senior Resident Inspector, Dresden

k:rpa:insp:d93012:1

9306300229 930624  
 PDR ADDCK 05000237  
 Q PDR

## ATTACHMENT

### RESPONSE TO INSPECTOR FOLLOWUP ITEM

#### NRC INSPECTION REPORT

50-237/93012, 50-249/93012

#### INSPECTOR FOLLOWUP ITEM: (237/93012-01; 249/93012-01)

The inspector identified a Shutdown Management Protected Pathway component sign lying on the Unit 2 drywell grating. The sign indicated the electromagnetic relief valves (EMV) were a "protected component." However, the sign was not attached to the EMVs or related components. The inspector previously identified an unattached Protected Pathway sign in the drywell on March 10, 1993, as documented in Inspection Report Nos. 50-237/249-93011(DRP).

Failure to adequately control the placement and removal of the Protected Pathway signs was considered a weakness in the implementation of the shutdown safety program. The signs prevented inadvertent operation of components that could potentially affect reactor vessel inventory. The signs were used during periods when shutdown risk activities were in progress.

#### DRESDEN STATION'S RESPONSE:

On January 23, 1993, Protected Pathway signs were hung on the first-to-second floor ladders leading to the Electromatic Relief Valves (ERVs) prior to the removal of the main steam line plugs. The ERVs were elevated to Protected Pathway status to prevent work on the valves which could result in the inadvertent draining of the reactor vessel. When the Electromatic Relief valves were removed from Protected Pathway status, direction was given to remove these signs. While the signs were removed from the drywell ladders, they were not properly removed from the drywell. On two separate Drywell inspection tours, the Illinois Department of Nuclear Safety Inspector found these Shutdown Risk Management Protected Pathway component signs lying on the Unit 2 drywell grating.

## ATTACHMENT

### RESPONSE TO INSPECTOR FOLLOWUP ITEM

#### NRC INSPECTION REPORT

50-237/93012, 50-249/93012

The intent of the Shutdown Risk Management Program is to provide a heightened awareness of plant status during outage periods, to establish a committee review process with respect to the scheduling of significant outage activities, and to ensure that proper contingency plans are in place to address potential failures. Protected Pathway Component signs are just one segment of the comprehensive Shutdown Risk Management Program. The primary implementing procedure for the Shutdown Risk Management Program is Dresden Administrative Procedure (DAP) 18-05, "Shutdown Risk Management". This procedure states that the Station Work Planning Department will assist Operations in the placement of Protected Pathway Component Caution signs in order to provide greater awareness of protected pathway equipment.

Dresden Station believes the occurrence described in the first paragraph to be an isolated event with minimal safety significance. Nevertheless, measures have been taken to address the issue. On May 5, 1993, Work Planning performed a complete drywell walkdown to ensure proper sign placement. Additionally, the Assistant Superintendent of Work Planning distributed a letter on May 6, 1993, providing Operations and Work Planning personnel further guidance on the placement and removal of Protected Pathway signs. To prevent recurrence, Work Planning will revise DAP 18-05 to include indexing and logging of Protected Pathway signs. Dresden Station is intent on maintaining an effective Shutdown Risk Program. Learning from past events is an essential element in the continued success of this program.