



Commonwealth Edison

Dresden Nuclear Power Station

R.R. #1

Morris, Illinois 60450

Telephone 815/942-2920

Attachment 3

December 3, 1992

Mr. A. B. Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Dresden Station Units 2 & 3 NRC Docket 50-237 & 50-249
Control Rod Misposition Event Update

Dear Mr. Davis:

In my letter of November 25, 1992, I provided preliminary information on a control rod mispositioning event and of Commonwealth Edison's immediate actions. In that letter I indicated that we had formed a special event investigation task group to provide an early assessment of the event independent from station management. Today's letter provides a further description of that effort, a summary of key findings of that investigation, as well as the status of related matters.

The task group, headed by the Manager of our Nuclear Fuel Services Department, began its work on November 25, 1992 and issued its preliminary findings December 1, 1992. Key individuals from the Corporate Nuclear Operations Department, who are familiar with control rod movement and conduct of operations, formed the membership of the task group. They reported directly to Mr. Ken Graesser, General Manager of BWR Operations. The task group objectives were to: 1) interview key site personnel; 2) review all documentation associated with the alleged event; 3) compile a complete and accurate time-line; and 4) perform a causal analysis.

The task group interviewed the five station personnel directly involved with the event. Additionally, other site personnel were interviewed, as appropriate, to obtain as complete and accurate a record as possible. All site procedures associated with control rod maneuvers and responses to an apparent control rod mispositioning were also reviewed to determine if the personnel responses were appropriate for the subject event and if the site procedures provided adequate direction to site personnel. Operating logs and alarm-typer records were also reviewed to complete the compilation of the time-line of the event.

The event investigation showed that inappropriate actions were taken by five individuals in response to a control rod misposition event. Those actions were concerned with:

- ✓ inadequate verification and second verification prior to movement of control rod H-1;
- ✓ lack of procedural adherence in responding to a mispositioned control rod;
- ✓ inappropriate documentation and execution of subsequent rod sequences, and failure to properly indicate the situation under which control rod H-1 was moved; and,
- ✓ failure to properly report or log this event, including failure to discuss it with station senior management.

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The task group report has been issued to Mr. Ken Graesser. That report and all supporting materials have been made available to NRC personnel on-site.

Based on the results of this investigation, Commonwealth Edison has taken, or will take, several additional actions. As of December 2, 1992, four of the five involved individuals have been released from employment with Commonwealth Edison. Commonwealth Edison has suspended the fifth individual for a week without pay. This individual has been counseled and will return to his position as a nuclear engineer-in-training. Our review has found no evidence that other personnel had any involvement in the September 18, 1992 event.

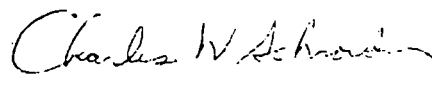
Beyond the specific personnel actions, and to ensure management expectations are clearly conveyed and understood, the Dresden Station Manager will broadly communicate the results and conclusions of the investigation to all station personnel. That communication will reemphasize in the strongest fashion the need to uphold the special trust held by the Company, its employees, and especially licensed operators, in assuring licensed activities are conducted in a safe manner. The Dresden Station Manager will ensure complete communication, including detailing his expectations regarding trustworthiness and integrity, and describing the specific personnel actions taken in this case, as described above.

Additionally, all of Dresden's qualified nuclear engineers will complete a refresher training course on coastdown flux shaping by December 4, 1992. In my letter of November 25, 1992, I described our senior management shift coverage and corporate overview of qualified Nuclear Engineer activities on shift. Based on the results of Commonwealth Edison's reviews to date and the actions described in this and previous paragraphs, we believe that continuation of these two oversight activities is no longer necessary, and will discontinue both after December 5, 1992.

Senior station and corporate management will closely review this event, including the findings and recommendations of the task group, to determine whether further actions are warranted.

I would like to close by reemphasizing that Commonwealth Edison believes that worker trustworthiness and integrity is essential to safe plant operation. Any deviations from that trust will be addressed with the utmost seriousness. Commonwealth Edison's senior management at its stations and the corporate offices will move aggressively to reiterate and reinforce the unacceptability of any individual's performance that does not meet the highest standards of personal and professional integrity.

Sincerely,

 12/13/92

for - Michael J. Wallace
Chief Nuclear Operating Officer

cc: NRC Document Control Desk
Dresden Senior Resident Inspector
B. Siegel, Project Manager - NRR

ATTACHMENT 4

Personnel Contacted

Commonwealth Edison Company (CECo)

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T. Rieck, Nuclear Fuel Services Manager
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