

NOTICE OF VIOLATION

Commonwealth Edison Company  
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249  
License Nos. DPR-19; DPR-25

During an NRC inspection conducted June 19 through August 16, 1993, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

1. 10 CFR 50, Appendix B, Criterion II, "Quality Assurance Program," required in part, that control be provided over activities affecting the quality of the identified structures, systems, and components to an extent consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment, suitable environmental conditions for accomplishing the activity, such as adequate cleanness, and assurance that all prerequisites for the given activity have been satisfied.

Contrary to the above:

- a. On July 14, 1993, management failed to ensure adequate cleanness of the Unit 3 drywell prior to closeout.
- b. On July 16, 1993, management failed to control activities in the Unit 2 reactor building in that there were numerous examples of unattended, unsecured portable (i.e. on wheels) equipment alongside safety related motor control centers and the access stairway to the Unit 2 east low pressure coolant injection and core spray room.
- c. During the period July 16 through 30, 1993, management failed to control scaffolding erection and maintenance activities in the Unit 2 west low pressure coolant injection and core spray corner rooms. Specifically, unsecured equipment including: scaffold material, two electric motors, and a ladder, were left unattended.

This is a Severity Level IV violation (Supplement I).

2. Dresden Technical Specification 6.2.A.1 stated the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2 dated February 1978, shall be established, implemented, and maintained. Regulatory Guide 1.33 Appendix A.1.c included administrative procedures, general plant operating procedures, and procedures for startup, operation, and shutdown of safety related systems.

- a. Dresden Operating Procedure (DOP) 4400-08, "Circulating Water System Flow Reversal," required condenser suction backpressure of less than four inches mercury prior to initiating a flow reversal.

Contrary to the above, the prerequisites to DOP 4400-08 did not include adequate qualitative criteria to perform the task and resulted in a Unit 3 automatic shutdown from a loss of condenser vacuum on July 10, 1993.

- b. Dresden Administrative Procedure (DAP) 07-27, "Independent Verifications," required as a minimum, independent verification of all fuses used in safety related systems. DAP 07-27 also required that independent verification (IV) be documented on the IV Log Sheet when no other procedural sign-off existed.

Contrary to the above, prior to August 14, 1993, fuses used in safety related systems were removed and placed back in service without independent verification during ground detection activities.

- c. Dresden Electrical Surveillance (DES) 6600-05, "Dresden Diesel Generator One Month Electrical Maintenance Surveillance Inspection" required the immersion heater current to be approximately 17 amps.

Dresden Administrative Procedure 09-11, "Conduct of Surveillance, Special, and Complex Procedures," required the generation of a problem identification form and the prompt notification of the shift engineer or designee when the procedural results were found outside of those designated in the procedure.

Contrary to the above, on July 8, 1993, electrical maintenance personnel failed to initiate a problem identification form, and failed to promptly notify the shift engineer when the acceptance criteria for the immersion heater current was not met.

- d. Dresden Administrative Procedure 07-05, "Operating Logs and Records," required degraded or inoperable equipment to be logged in the Degraded Equipment Log.

Contrary to the above, on July 20, 1993, the operating authority authorized work on a Unit 2 source range monitor but failed to document the inoperable status in the Degraded Equipment Log.

- e. Dresden Radiological Procedure (DRP) 1460-01, "Routine Personnel Decontamination," stated that personnel contamination levels less than 100 counts per minute (cpm) above background shall be recorded in the Contamination Log.

Contrary to the above, on July 16, 1993, and on several other occasions throughout the inspection period, radiation technicians failed to document shoe contamination events in the Contamination Log.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," required that measures shall be established to assure that conditions adverse to quality such as deficiencies were promptly identified and corrected.

Contrary to the above, between March 23 and July 19, 1993, a condition adverse to quality, i.e., a contaminated water leak in the 3B core spray pump room, existed and was not properly contained.

This is a Severity Level IV violation (Supplement I).

4. 10 CFR 50.73(a)(2)(i)(B) required the licensee to report within 30 days any operation or condition prohibited by the plant's technical specification. Technical Specification Table 3.2.2. requires two operable sustained high pressure instrument channels per trip system.

Contrary to the above, one of the two technical specification required instrument channels was not operable on May 12, 1993, when the licensee discovered an isolation condenser pressure switch test valve closed, and the licensee did not submit an event report until July 28, 1993, which was 72 days later.

This is a Severity Level IV violation (Supplement I).

With regard to violations 1, 2, and 3, pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Notice of Violation

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If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

With regard to violation 4, the inspection showed that steps had been taken to correct the identified violation and to prevent recurrence. Consequently, no reply to that violation is required and we have no further questions regarding this matter.

Dated at Glen Ellyn, Illinois  
this \_\_ day of September 1993