



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

February 25, 1994

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3 Response to  
Notice of Violation; Inspection Report 50-237/93034; 50-  
249/93034  
NRC Docket Numbers 50-237 and 50-249

Reference: E. G. Greenman letter to M. D. Lyster, dated January 28,  
1994 transmitting Inspection Report 50-237/93034; 50-  
249/93034.

Enclosed is Dresden Station's response to Notice of Violation regarding  
inadequate corrective actions transmitted with Inspection Report 50-  
237(249)/93034 for transmittal to the Nuclear Regulatory Commission as  
requested in the referenced letter.

The response due date to Notice of Violation regarding Post-TMI Order  
transmitted with the same inspection report has been extended to 30 days after a  
management meeting has been conducted to discuss the issues involved with this  
violation. The date of the management meeting will be determined by February  
25, 1994. This has been discussed with and approved by B. Clayton, Branch  
Chief, Division of Reactor Projects.

If your staff has any questions concerning this letter, please refer them to  
Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7250.

Sincerely,

D. Farrar

Nuclear Regulatory Services Manager

08-162

attachments

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

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ATTACHMENT  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-237/93034; 50-249/93034

**VIOLATION:** (50-237/93034-08)

10 CFR 50, Appendix B, Criterion XVI, Corrective Actions, required that measures be established to assure that conditions adverse to quality are identified and corrected.

Contrary to the above, the corrective actions for a previous violation (50-237/93020-7b) were inadequate in that, on January 5 and 10, 1994, numerous portable carts were found unsecured.

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

**REASON FOR THE VIOLATION:**

The cause of this violation has been identified as a weakness in management's ability to reinforce procedure adherence at the worker level. Causal factors in this event are inadequate reinforcement of management's expectations and the inadequate reinforcement of the requirements to comply with procedures.

Contributing to this violation is the failure of personnel to comply with written procedures due to either shortcuts taken to complete the task (inadequate work practice), or a perceived pressure to complete a task (inadequate supervisory methods).

The results of the corrective actions taken in response to the violation transmitted with Inspection Report 50-237(249)/93020 were not entirely adequate in correcting the weakness in management's ability to establish measures to assure conditions adverse to quality are identified and corrected. Since an effectiveness review of the corrective actions was not performed to determine if they were entirely adequate, adjustments, as required, were not made. Failing to perform an effectiveness review and therefore failing to take appropriate action based on that review are also contributing factors to this violation.

**CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:**

The portable equipment in question was properly secured as soon as the shift was made aware of the discrepancies. A walkdown performed by supervision as part of the corrective action for these violations did not reveal any other similar concerns.

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**CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:** (continued)

The corrective actions for the previous violation from NRC Inspection Report 50-237(249)/93020 were reviewed. All programmatic corrective actions are still in place which include assigning a Material Condition Coordinator to the Maintenance Staff, assigning Material Condition Area Inspectors throughout the organization with proceduralized expectations, making continuous improvements to planning and scheduling to adequately allocate resources, and conducting communications meetings between station management and bargaining unit leadership for the purpose of opening lines of communication, reinforcing standards and expectations, as well as reviewing accountability measures for all site personnel. The Shift Operations Supervisor has completed his rotating shift assignments and non-licensed operators have completed a coaching session on the performance of operator rounds. This coaching was provided by a senior shift supervisor.

Based on the review, some results of these corrective actions have been a continued improvement in the material condition of the plant, a reduction in procedure compliance issues in the Operations Department, an improving relationship between station management and bargaining unit leadership, a better understanding of procedure usage and adherence expectations by station personnel, and a development of a total record policy for purposes of accountability.

The current revision (Rev 02) of DAP 03-20 (Restraint of Portable Equipment) was reviewed to determine if adequate guidance and direction is provided for securing portable equipment when it is left unattended. The review determined that the procedural guidance provided in DAP 03-20 is adequate.

The current revision (Rev 15) of DAP 03-11 (Dresden Inspection Program) which provides guidance and direction for the Material Condition Coordinator and Area Inspectors was reviewed to determine if the issues of unsecured portable equipment and other conditions adverse to quality at the site are adequately addressed, including direction on how to correct and/or report deficiencies. The review determined that the procedural guidance provided in DAP 03-11 is adequate.

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**CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION:**

1. Management expectations and policies governing the proper adherence to procedures will be re-emphasized by Station Tailgate. It will be emphasized that anyone who willfully violates procedures will be subject to disciplinary action. The requirements of DAP 03-20 (Restraint of Portable Equipment) will also be covered. This tailgate will be conducted prior to March 31, 1994.
2. Personal performance expectations are being clearly conveyed to management personnel both verbally and in writing as a standard part of management personnel's PPR (Performance Planning and Review) process. Included in the written communication are specifics associated with procedural compliance, personal safety, station security and radiation exposure. All bargaining unit personnel are receiving the same message by way of department meetings.
3. Dresden has initiated a Level 2 PIR (Problem Investigation Report) to address the concerns related to procedure adherence. As a result of that investigation, the job descriptions for all first line supervisory personnel and bargaining unit personnel in the Electrical Maintenance, Instrument Maintenance, Mechanical Maintenance, and Site Engineering and Construction departments will be reviewed and revised as needed to establish clear lines of responsibility for plant work activities, including procedure adherence and procedure problem resolution. This action is expected to be completed by March 12, 1994.
4. In an effort to reduce the potential for unsecured Instrument Maintenance Department carts being left unattended in the control room, the Instrument Maintenance Department will remove them during shift changes whenever appropriate. Carts that are left unattended in the control room will be restrained in accordance with DAP 03-20 (Restraint of Portable Equipment).
5. The Maintenance and Technical Services area of the Training Department will incorporate DAP 03-20 (Restraint of Portable Equipment) training into the annual required training for maintenance and technical services personnel. This will be accomplished by June 30, 1994. DAP 03-20 is already included in the operations area of training.

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6. Organizational and functional changes are being made in the Maintenance Department to remove the administrative burden from the first and second line supervisors and the Maintenance Masters. Items such as package preparation and management of the work analyst staff, procedures and management of the procedure writing staff, surveillance scheduling, and NTS (Nuclear Tracking System) are being transferred to the Maintenance Staff. This will allow first and second line supervisors and the Maintenance Masters to focus on quality, production, active supervision including coaching and teaching, communicating expectations, and holding personnel accountable for their performance.
7. Operations Department has implemented a program to code and trend information available from the PIF (Problem Identification Form) process. Specifically, the program is designed to allow Operations Department to review data for trends and to review corrective actions for timeliness and effectiveness. Based on the results of the reviews, actions can be taken to correct conditions that are adverse to quality, or to implement corrective actions that are more effective. This program is being considered for implementation in other departments. Currently, Operations Staff personnel are discussing the program with personnel from other departments such as Maintenance Staff and Rad Protection.
8. The NTS (Nuclear Tracking System) entry form will be revised to include a section for indicating the need or desire for an effectiveness review of the corrective action identified. Upon revising the form, it will be incorporated into DAP 02-15 (Site Program for Tracking Commitments and Corrective Actions). Revision of the form and incorporation into the DAP will be completed by April 30, 1994.
9. DAP 02-27 (Integrated Reporting Process) will be revised to include requirements for, and guidance and direction on how to perform effectiveness reviews for selected events. The effectiveness reviews will be used to determine if corrective actions are preventing recurrence of adverse conditions and events. The revision to the procedure will be completed by July 1, 1994.

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Full compliance will be achieved when the enhanced effectiveness reviews, which will be conducted in accordance with the revised DAP 02-27 (Integrated Reporting Process), are initiated. It is anticipated that these effectiveness reviews for selected events will be initiated by January 03, 1995.