Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 11, 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 and Notice of Deviation; Inspection Report 50-237/94002; 50-249/94002
NRC Docket Numbers 50-237 and 50-249

Reference: E. G. Greenman letter to M. D. Lyster, dated March 11, 1994 transmitting Inspection Report 50-237/94002; 50-249/94002.

Enclosed as Attachment 1 is Commonwealth Edison Company's (CECo) response to Notice of Violation regarding reportability of repeat failures of the reactor water level emergency core cooling system initiation instruments. Enclosed as Attachment 2 is CECo's response to Notice of Deviation regarding biocide injection during cooling water system operation. The Notice of Violation and Notice of Deviation were transmitted with Inspection Report 50-237(249)/94002. CECo's responses are being submitted as requested in the referenced letter.

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

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 1
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/94002; 50-249/94002

VIOLATION: (50-237/94002-02)

10 CFR 50.73(a)(1) stated the licensee shall submit a licensee event report for any reportable event within 30 days after the discovery of the event.

10 CFR 50.73(a)(2) required written notification for any condition that alone could have prevented the fulfillment of the safety function of a system needed to mitigate the consequences of an accident.

Contrary to the above, between January and December 1993, the licensee failed to submit required licensee event reports for repetitive failures of the reactor water level emergency core cooling system initiation instruments.

This is a Severity Level IV (Supplement I)

REASON FOR THE VIOLATION:

The personnel responsible to review these events for reportability were unaware that a drift of a single instrument could be reportable if the problem was generic. This unawareness was due to inadequate guidance in the Commonwealth Edison Reportability Manual (CECORM), and to inadequate training.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

Operating personnel holding Senior Reactor Operator Licenses, the System Engineer responsible for Emergency Core Cooling System Yarway level switches, and Regulatory Assurance personnel were informed of this event - including the issuance of a Notice of Violation - and its cause. These personnel were informed that apparent generic failures were to be screened carefully for reportability under 10 CFR 50.72(b)(2)(iii) and 50.73(a)(2)(v), and were specifically advised that further drifts of Yarway level instruments were reportable.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION:

The CECORM (Commonwealth Edison Reportability Manual) will be revised to incorporate the guidance in NUREG 1022 Revision 1 (Section 3.3.3 Example 12), which adequately clarifies the reporting requirement. The revision will issued by May 15, 1994.

Personnel with Senior Reactor Operator Licenses, System Engineering personnel, Site Engineering personnel, Regulatory Assurance personnel, and personnel presently serving on the Event Screening Committee will be informed of the intent and implications of the CECORM revision by July 1, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved on July 1, 1994, when the appropriate Dresden personnel have been informed of the intent and implications of the CECORM revision.

ATTACHMENT 2
RESPONSE TO NOTICE OF DEVIATION
NRC INSPECTION REPORT
50-237/94002; 50-249/94002

DEVIATION: (50-237/94002-01)

Dresden Station's response to Generic Letter 89-13, "Service Water System Problems Affecting Safety Related Equipment", dated January 29, 1990, stated that for open cooling water systems, a biocide would be injected manually into the intake bays. At Dresden, the biocide injection was continuous during cooling water system operation.

Contrary to the above, between December 30, 1993, and February 17, 1994, the Unit 2 and 3 containment cooling water systems were operated without biocide injection into the intake bays.

REASON FOR THE DEVIATION:

The investigation into this event has identified that the failure to strictly adhere to the procedure being used at the time (Special Procedure 93-11-110 "Differential Pressure Test of MO 3-1501-13B"), coupled with delayed maintenance actions to install and heat trace a permanent biocide injection line.

Additionally, the investigation identified other concerns which will be corrected by actions taken to avoid further deviations. These other concerns are: 1) The clarity and accuracy of the Dresden Administrative Procedures (DAPs) which provide guidance and direction for usage of, and adherence to station procedures; 2) The work planning processes which are used to identify and schedule work that is seasonal in nature (i.e., heat tracing of outdoor lines prior to freezing temperatures), and; 3) The original commitment that was made in response to Generic Letter 89-13 regarding the injection of a biocide into the intake bays during operation of open cooling water systems.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

Immediate corrective actions to address the frozen and ruptured hosing was to contract the station's chemical vendor to replace the ruptured, non-heat traced temporary hosing with new, heat traced temporary hosing at the chemical feed trailer. The new heat traced temporary hosing has been installed and the chemical feed trailer was returned to service in early March, 1994.

Additionally, the deviation was discussed with the Chemistry and Operations Departments to clarify the present requirements for injecting biocide in accordance with our current response to Generic Letter 89-13 regarding biofouling of open water cooling systems.

Furthermore, the requirement for, and the importance of procedure adherence was again clearly communicated to the Operations Department personnel.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED: (cont'd)

Finally, a Problem Identification Form (PIF) was generated by a Shift Engineer to address the procedure compliance issue, specifically as it relates to biocide injection during operation of open cooling water systems.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER DEVIATION:

A new heat traced injection line will be installed at the chemical feed trailer to replace the temporary heat traced hosing that is presently installed. The new injection line installation and associated heat tracing will be completed by October 15, 1994.

The Work Planning Department is developing methods to identify and schedule work that is seasonal in nature. These methods will be integrated with the current processes that are being used to plan and schedule work. Milestones are being developed to assist with ensuring work which is seasonal in nature is performed prior to experiencing the associated adverse seasonal condition. The new methods to identify seasonal work and associated milestones will be developed and incorporated into the current processes by July 15, 1994.

The Operation Department is reviewing the DAPs (Dresden Administrative Procedures) associated with procedure usage and adherence (DAP 07-02, DAP 09-01, DAP 09-11, and DAP 09-13). Combined with the review of the DAPs, a questionnaire addressing procedure usage and adherence concepts is being distributed to selected Operations Department personnel, and personal interviews are being conducted. Based on the results of the DAP review and the information obtained from the questionnaires and interviews, the appropriate corrective actions will be initiated. The corrective actions may take the form of procedure revisions, training enhancements, and/or coaching and training of individuals or crews, or some combination of same. The completion date for corrective actions related to Operations Department training enhancements and/or coaching and training is July 15, 1994. The date of completion for any procedure changes associated with procedure usage and adherence is dependent upon the scope of changes required, but will be completed by December 30, 1994.

The current Generic Letter 89-13 commitment related to injection of biocide during operation of open cooling water systems, which was made in the January 29, 1990 correspondence, will be reviewed. Based on the review of the correspondence and a review of the intent of the chemical injection program, coupled with other related items such as Environmental Protection Agency requirements, and results of chemical injection results monitoring data, a revised response will be generated and submitted. The revised response will be submitted by April 30, 1994.

DATE WHEN CORRECTIVE ACTIONS WILL BE COMPLETED:

The new biocide injection line and associated heat tracing installation will be completed by October 15, 1994.

Work Planning Department methods and milestones for addressing seasonal work will be developed and incorporated into current processes by July 15, 1994.

Corrective actions related to Operations Department Training enhancements and/or coaching and teaching for procedure usage and adherence issues will completed by July 15, 1994.

Corrective actions related to procedure changes for procedure usage and adherence issues will completed by December 30, 1994.

A revised Generic Letter 89-13 commitment related to biocide injection will be submitted by April 30, 1994.