



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 4, 1994

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

Attn: Document Control

Subject: Dresden Nuclear Power Station Units 2 and 3
Supplemental Information with Regards to Response to
Notice of Violation associated with
Inspection-Report 50-237/91016; 50-249/91015
NRC Docket Numbers 50-237 and 50-249.

Reference: T. Kovach letter to USNRC dated April 15, 1992,
transmitting supplemental information in response to
subject Notice of Violation.

The reference letter addresses an annual date which will be provided to the Nuclear Regulatory Commission on Commonwealth Edison's Corporate Setpoint Control Program. Attached is an update for 1993. If you have any questions concerning this, please contact Peter Piet, Nuclear Licensing Administrator at (708) 663-7286.

Sincerely,


for Dennis L. Farrar
Regulatory Services Manager

Attachment

cc: J.B. Martin, Regional Administrator - RIII
J. Stang, Project Manager - NRR
M. Leach, Senior Resident Inspector, Dresden Station

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Setpoint Control

Description:

During a 1987 corporate evaluation, INPO identified weaknesses in Edison's control of setpoint data, particularly with respect to instrumentation. At that time, CECo initiated a setpoint control program, with its initial emphasis on plant instrumentation.

The current Instrument Program consists of:

- The program goal is to establish a standardized, consistent computer Instrument Database, with supporting documentation and appropriate control procedures, implemented consistently at all six stations. Backfit the information contained in the database.
- Expand the development of the protective relay database in the DB2 environment to include all devices. Develop a shell database structure void of data.
- Integrate the setpoint databases with EWCS (Electronic Work Control System).
- Develop a plan to integrate existing programs that anticipate performing walkdowns and/or document reviews. This will maximize the data gathering efforts and minimize resources and cost.
- Developing procedures and guidelines to control the database structure, the information in it, and the methodology for performing the supporting setpoint error analysis.
- Developing a company policy to determine which instruments require setpoint error analysis.
- Performing or verifying analysis to justify setpoints and channel accuracies found during database accumulation. Focus instrument setpoint error analysis effort to Technical Specification functions and reassess need for additional analysis or verification.

Status - Instrument: (As of December 31, 1993)

Database

- Development is complete for all stations.
- Initiated work on printing datasheets, test reports, and producing microfiche. As of December, 1993, the capability exists to print instrument datasheets from the instrument database on the CECo mainframe computer. Producing microfiche will be the next priority.
- A P.C. program has been developed and implemented that will allow revisions to the instrument database electronically. This will reduce the cost of database DCRs, as CECo will have Engineering review and data entry work scope responsibility.

Error Analyses

- TIDs for setpoint/loop accuracy analyses issued for use.
- TID for scaling issued for use.
- Acquisition of calculations from AEs completed.
- TID for M&TE equivalency issued for use.

Procedures

- Approval of data elements and database structure (revision) issued for approval.
- Data entry issued for approval.
- Processing of setpoint change request issued for approval.
- Document change request (revised) issued for approval.
- Minor database change request issued for approval.
- NOD MA.10 on hold.

Status - Instrument: (continued)

PWR Error Analyses

- Instrument Classifications complete, NSSS RPS/ESF analyses complete. All remaining Tech Spec. setpoints and permissives prepared and are in final approval. EOP and Reg. Guide 1.97 analyses to start 1/94 with an expected completion of 12/94, predicated on program scope. Station support will take priority.

BWR Error Analyses

- Instrument classifications complete. Tech Spec. RPS/ESF analyses complete. Remaining Tech Spec., EOP, and Reg. Guide 1.97 analyses to continue with an expected completion of 12/94, predicated on program scope. Station support will take priority.

Labeling/DCRs

- In progress for D/QC/LSCS, labeling not initiated for LSCS due to funding constraints and mature plant priorities.

Status - Control of Engineering Data System (COEDS): (As of December 31, 1992)

- Database modeling completed, structure development complete.
- Software development for implementation of appropriate design controls is complete.
- COEDS initial development is complete and tested. Fuse data for all six stations has been loaded and will be used to demonstrate the system. COEDS can be in use First Quarter of 1994.
- COEDS to go into production - April 1994 with NETS controlled 480 V relay data.