

May 11, 1994

Docket No. 50-237
Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. M. Lyster
Site Vice President
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, IL 60450

Dear Mr. Lyster:

SUBJECT: NOTICE OF VIOLATION (INSPECTION REPORTS NO. 50-237/94003(DRS);
NO. 50-249/94003(DRS))

This letter refers to the inspection conducted by Mr. H. A. Walker and others of this office from February 28 through April 5, 1994. The inspection included a review of authorized activities for your Dresden Nuclear Power Station. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel and observation of activities in progress. The purpose of the inspection was to verify that engineering activities at the Dresden Power Station were conducted safely and in accordance with NRC requirements.

The inspection verified that engineering and technical support activities at the Dresden Power Station were acceptable and met regulatory requirements. The inspectors noted significant improvements, from our last engineering and technical support inspection, in the Site Engineering and Construction (SEC) Organization; however, little improvement, if any, was noted in the Systems Engineering Organization and we are concerned with the apparent lack of rigor and assertiveness in the performance of systems engineering activities. Adequate involvement of system engineers in plant support activities was not always evident. Most engineers were knowledgeable of their assigned area and appeared to be well motivated; however, there were notable exceptions. For example, the recently issued design basis document for the standby liquid control system contained several significant errors. In addition, significant problems were noted in the control of temporary alterations which indicated the need for more attention by both engineering organizations.

Based on the inspection results, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations are of concern because the failure to determine and correct design errors could result in systems that could not

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perform the intended function. Procedural compliance is important because the established and proven methods of performing safety significant activities are essential. Accurate up-to-date drawings in the control room are essential for troubleshooting and diagnosing equipment problems in order to maintain safe plant operations.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In responding, please indicate the actions you are taking to address the listed unresolved matter and the inspection follow up item.

In your response, you should document the specific actions taken and any additional actions you plan to take to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Geoffrey C. Wright, Chief
Engineering Branch

Enclosures:

1. Notice of Violation
2. Inspection Reports
No. 50-237/94003(DRS);
No. 50-249/94003(DRS)

See Attached Distribution

RIII

Walker

5/10/94

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Hiland

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Shafer

5/11/94

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Wright

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cc w/enclosure:

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Supervisor
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Services Manager
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bcc: PUBLIC IE-01