

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Nuclear Power Station

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

During an NRC inspection conducted from February 28 through April 5, 1994, 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 Part 50, Appendix B, Criterion III, "Design Control," requires verifying and checking the adequacy of design.

Contrary to the above:

Design control measures for controlling modifications M12-2-84-119 and M12-3-84-119, which were made to the Standby Liquid control system in 1986 and 1987, were not adequate. The system pressure, after the modifications, was calculated to be 1330 psig, which exceeded the original design pressure by 55 psig. This increased pressure was not addressed. The hardware was not upgraded and the increase in pressure was not included in specified testing requirements (237/249/94003-01(DRS)).

This violation represents a Severity Level IV problem (Supplement I).

2. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings.
 - A. Dresden Operating Procedure DOP 6500-04, "Racking Out 4160 Volt Manually Operated Air Circuit Breaker," required that breakers removed from cubicles be restrained to prevent rolling.
 - B. & C. Dresden Administrative Procedure DAP 02-09, "Control of Critical Drawings" required that control room drawings be revised or updated to reflect the correct plant configuration.

Contrary to the above:

- A. On March 30, 1994, a spare 4KV breaker in the Unit 2 Turbine Building 4KV Switchgear Room, was found not to be secured to prevent rolling as required by DOP 6500-04 (237/94003-02A(DRS)).
- B. On March 10, 1994, the control room copy of drawing 12E-2322B, "Overall key Diagram, 125V DC Distribution Centers, Dresden Nuclear Power Station Units 2 & 3," Revision C, dated July 3, 1991, had not been marked or revised to show the changes made by the installation of partial modification M12-3-90-13A as required by DAP 02-09. This partial modification was completed in January of 1993 (249/94003-02B(DRS)).

- C. On March 10, 1994, the control room copy of drawing 12-3345, Sheet 2, "Schematic Control Diagram, 4160 Volt Bus 33-1, 4KV Switchgear Bus 40 Feed Bkr., Unit 3," Revision AF, dated March 9, 1993, was found to be incorrectly marked for temporary alteration TA III-40-92 and did not reflect the correct plant configuration as required by DAP 02-09 (249/94003-02C(DRS)).

This violation represents a Severity Level IV problem (Supplement I).

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. 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.

Dated at Lisle, Illinois this
11th day of May 1994