



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

June 01, 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 50-237/94005; 50-249/94005  
NRC Docket Numbers 50-237 and 50-249

**Reference:** E. G. Greenman letter to M. D. Lyster, dated May 02, 1994 transmitting Inspection Report 50-237/94005; 50-249/94005.

Enclosed is Commonwealth Edison Company's (CECo) response to Notice of Violation regarding failure to establish, implement and maintain "System Checklist" and "Locked Valve Checklist" procedures as required by Technical Specification 6.2.A.1, which was transmitted with Inspection Report 50-237(249)/94005. The response is 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  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-237/94005; 50-249/94005

**VIOLATION:** (50-237/249-94005-02)

Dresden Technical Specification 6.2.A.1 states that the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2 dated February 1978, shall be established, implemented, and maintained. Regulatory Guide 1.33 Appendix A.1.c included procedures for startup, operation, and shutdown of safety related systems.

- a. Dresden Operating Procedure (DOP) 6600-M2, "Unit 2/3 Standby Diesel Generator", required the Unit 2/3 diesel generator cooling water pump discharge line vent valve be locked closed.

Contrary to the above, on March 29, 1994, the Unit 2/3 diesel generator cooling water pump discharge line vent valve was not locked closed.

- b. Contrary to the above, during the period of June 19 to August 16, 1993, the licensee failed to maintain Dresden Operating Procedures DOP 1400-M1, "Unit 2 Core Spray System" and DOP 0040-M2 and M3, "Locked Valve List During Operations", in that numerous discrepancies were identified between DOP 1400-M1 and DOP 0040-M2 and M3. Additionally, during a walkdown of the Unit 2 Core Spray System, several valves were found to be in positions not in compliance with the requirements of DOP 1400-M1.

This is a Severity Level IV (Supplement 1)

**REASON FOR THE VIOLATION:**

Based on the investigations performed to determine why the discrepancies in Core Spray System procedures existed, it was determined that they were caused by changes that were made to the Locked Valve Checklists but not incorporated into the System Checklists. Therefore, two different checklists did not contain identical information. The discrepancy in the Diesel Generator System procedures was caused by changes that were made to the Locked Valve Checklists that had not been incorporated into the System Checklists, or vice versa.

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NRC INSPECTION REPORT  
50-237/94005; 50-249/94005  
(Continued)

**CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:**

In response to the procedure discrepancies in the Core Spray System identified during the June to August 1993 time frame, a team made up of an Operations Department Procedure Writer, the station Procedure Coordinator and the station Procedure Manager performed an investigation to determine cause and identify scope of problem. During the investigation, DOP 1400-M1, "Unit 2 Core Spray System", revisions 9, 10 and 11, DOP 0040-M2, "Unit 2 Locked Valve Checklist: Inaccessible During Operations", current revision, and DOP 0040-M3, "Unit 2 Locked Valve Checklist; Accessible During Operations", current revision, were thoroughly reviewed. The originator and proofreader for the procedure revisions reviewed were interviewed, and all valve checklist discrepancies that had been identified in accordance with DAP 07-20, "System Checklists", during D2R13 were reviewed. Based on the investigation, it was determined that DOP 1400-M1, revision 11, contained errors and needed to be revised. It was also determined that the potential scope of the problem was limited to a population of four procedures, one being DOP 1400-M1. There were no discrepancies identified in the other three procedures, therefore this problem was considered an isolated incident providing no indication of a large scale programmatic breakdown in the procedure revision process. A revision to DOP 1400-M1 was initiated and subsequently approved on November 6, 1993.

In response to the procedure discrepancy in the Unit 2/3 Diesel Generator System, the Unit 2/3 Diesel Generator cooling water pump discharge line vent valve was immediately locked in its current closed position, as a conservative measure. A permanent revision to DOP 0040-M3, "Unit 2 Locked Valve List: Accessible During Operation", was completed to indicate that the valve was "locked closed", verses "closed". This revision was approved on April 21, 1994. The completion of the revision to DOP 0040-M3 restored consistency between it and System Checklist DOP 6600-M2 with regards to the Unit 2/3 Diesel Generator cooling water pump discharge line vent valve, i.e., both procedures currently list the valve as "locked closed".

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

All Unit 2 checklist procedure discrepancies identified during the D2R13 outage and the NRC Inspection conducted during the June to August 1993 time frame are currently being addressed. Revisions for the affected Unit 2 checklist procedures are in progress. The revisions will be completed by September 1, 1994. As stated earlier, a revision to DOP 1400-M1 has been completed and was approved on November 6, 1993.

Discrepancies in the Unit 3 and Unit 2/3 checklist procedures will be identified during the D3R13 outage which is currently in progress. After completion of the D2R13 outage, checklist procedure revisions will be generated to address all identified discrepancies. The revisions for the Unit 3 and Unit 2/3 checklist procedures will be completed by September 1, 1994.

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(Continued)

**CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION:** (continued)

To determine a long term solution to the problem of discrepancies existing between System Checklists and Locked Valve Checklists, NUREG-0823, Integrated Plant Safety Assessment, Systematic Evaluation Program, Dresden Nuclear Power Station, Unit 2, Section 4.18.1, Locked-Closed Valves, and INPO 85-017, Revision 02 of the Guidelines for Conduct of Operations were reviewed. NUREG-0823, Section 4.18.1 states that "system lineup procedures and valve checklists are not designed to ensure containment integrity; rather they are designed to ensure proper system function". It also states that "A specific administrative procedure to periodically ensure that the containment isolation valves are in the proper position is essential". INPO 85-017, Revision 02 of the Guidelines for Conduct of Operations states that "Alignment checklists should be used to guide the operator in establishing the correct component positions", and that "A list of components that are required to be locked should be established and approved by the Operations Manager". It continues by stating "The list should be separate from standard alignment checklists".

Consistent with the guidance provided by NUREG-0823 and INPO 85-017, Revision 02, it has been determined that the designation of "locked" does not belong on the System Checklist procedures, but rather belongs only on the Locked Valve Checklists. By eliminating the "locked" designation on the System Checklists, two things will be accomplished: 1) All discrepancies between System Checklist procedures and Locked Valve Checklist procedures regarding whether or not a valve should be locked will be eliminated, and 2) The Locked Valve Checklist procedures will be the single source of information for locked valves, and will therefore be considered the "administrative authority" regarding locked valves. To eliminate the "locked" designation from System Checklist procedures will require revision to same for all units. This action will be completed by June 30, 1995.

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

Full compliance will be achieved upon completing revisions to System Checklist procedures for all units, to eliminate the "locked" designation for all valves, thereby leaving the Locked Valve Checklist procedures as the single source of information and "administrative authority" regarding locked valves. As stated earlier, these revisions will be completed by June 30, 1995.