



Commonwealth Edison
Dresden Nuclear Power Station
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Morris, Illinois 60450
Telephone 815/942-2920

June 14, 1994

GFSLTR 94-0197

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Licensee Event Report 94-013, Docket 50-249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10CFR50.73(a)(2)(i).

Sincerely,

Gary F. Spedl
Station Manager
Dresden Station

GFS/RES:cfq

Enclosure

cc: J. Martin, Regional Administrator, Region III
NRC Resident Inspector's Office
File/NRC
File/Numerical

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Dresden Nuclear Power Station, Unit 3	DOCKET NUMBER (2) 05000249	PAGE (3) 1 OF 3
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TITLE (4)
Missed Tech Spec 4.6.I.1.b. Surveillance (Snubber Visual Inspection)

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	19	94	94	-- 013 --	00	06	18	94	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER LEVEL (10) 000	20.2201(b)	20.2203(a)(3)(i)	50.73(a)(2)(iii)	73.71(b)						
	20.2203(a)(1)	20.2203(a)(3)(ii)	50.73(a)(2)(iv)	73.71(c)						
	20.2203(a)(2)(i)	20.2203(a)(4)	50.73(a)(2)(v)	OTHER						
	20.2203(a)(2)(ii)	50.36(c)(1)	50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)						
	20.2203(a)(2)(iii)	50.36(c)(2)	50.73(a)(2)(viii)(A)							
20.2203(a)(2)(iv)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(B)								
	20.2203(a)(2)(v)	50.73(a)(2)(ii)	50.73(a)(2)(x)							

LICENSEE CONTACT FOR THIS LER (12)

NAME Reino E. Salmi, Snubber Coordinator	TELEPHONE NUMBER (Include Area Code) Ext. 2348 (815) 942-2920
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
N/A									

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On May 19, 1994 at 1000 hours, an unidentified snubber, subsequently labelled 3-1626-02, was found in the Torus [BT] Basement of Unit 3. This snubber was on the safety-related line, 3-1626-1", which is the lower leg of level transmitter, LT 3-1626, which starts from the Torus penetration X-305D. It was determined on May 25, 1994 that the Unit 3 Technical Specification 4.6.I.1.b. was missed for this particular snubber since its installation. This Technical Specification requires a visual inspection of all safety-related snubbers, at most, once every eighteen months (plus or minus) 25%. Modification M12-3-88-41C included the installation of this snubber which was authorized for operation on February 2, 1990. The snubber was installed due to a seismic evaluation of Torus-attached piping. The root cause for this event is attributed to a modification process that did not identify the Technical Specification requirement. The safety significance of this event is minimal since no anomalies or apparent decline to the functionality of the snubber were found. The corrective actions will include a review of all modifications since January 1, 1980 for any snubber additions and a review of the snubbers added due to the Torus-attached piping seismic evaluation. No other occurrences of this event were found.

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.	
FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6)		PAGE (3)
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT IDENTIFICATION:

Missed Technical Specification 4.6.I.1.b. Surveillance (Snubber Visual Inspection) Due to Inadequate Modification Review.

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: 05/19/94 Event Time: 1000 hrs
 Reactor Mode: N Mode Name: Refuel Power Level: 0%
 Reactor Coolant System Pressure: 0 psig

B. DESCRIPTION OF EVENT:

On May 25, 1994, it was determined that Dresden Unit 3 Technical Specification 4.6.I.1.b was not performed for an unidentified safety-related snubber (subsequently labelled 3-1626-02) since its installation. Technical Specification 4.6.I.1.b. requires a periodic visual inspection of all safety-related mechanical snubbers of an interval not greater than 18 months +/- 25%.

During an inspection of another snubber on May 19, 1994, an unidentified snubber (3-1626-02) was found in the Torus [BT] Basement Bay 12 (Reactor Building Elevation 476'-6"). This snubber was located on the lower leg of the Torus Narrow Range Level Transmitter, LT 3-1626, which indicates in the main control room. This line runs from penetration X-305D of the Torus to LT 3-1626. An investigation was initiated and the as-built drawing (M-1130 Sheet 30) was found. The architect engineer that owns the drawing was contacted for further information. The architect engineer stated the snubber was installed due to the Torus Attached Piping Long Term Program evaluation which was performed in the mid 1980's. This program identified invalid engineering assumptions used in the original Mark I program and modifications that were implemented after the Mark I program which invalidated the existing Mark I analysis. The modification which included the installation of the snubber was performed to correct these program findings.

An investigation concluded that this snubber was installed under modification M12-3-88-41C which was authorized to declare the system operational on February 2, 1990. No indications in the modification indicated that the snubber coordinator was informed of the addition of this snubber.

The snubber was inspected and no anomalies or evidence of damage were found. The snubber was also within the allowable cold setting range which was determined by the architect engineer.

C. CAUSE OF EVENT:

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the Technical Specifications.

No records could be found in the modification package that the snubber coordinator was contacted or a revision to Dresden Technical Surveillance (DTS)

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0020-01, Snubber Inspection Criteria, was performed. Therefore, the modification process did not adequately inform the site personnel of performed changes to the site. Also, an adequate review of the Unit 3 Technical Specifications would have indicated that the snubber was to be inspected on a periodic interval and would have directed the modification engineer to ensure this surveillance is performed.

D. SAFETY ANALYSIS:

The safety significance of this event is minimal. The snubber was inspected and no anomalies or apparent damage to its functionality were found.

E. CORRECTIVE ACTIONS:

Snubber 3-1626-02 was inspected and no anomalies were found.

Procedure DTS 0020-01, Snubber Visual Inspection Criteria, will be revised to add snubber 3-1626-02 to the list of safety-related snubbers. This will ensure this snubber will be inspected with the rest of the safety-related snubbers as required.

The modification process has undergone many changes since 1988. Dresden Administrative Procedure (DAP) 05-01, Plant Modification Program currently involves a more thorough review of station procedures. Also, the current revision of DAP 05-01 includes a check for review of the modification package by personnel of the American Society of Mechanical Engineers (ASME) Section XI Inservice Inspection (ISI) and Inservice Testing (IST) Group. The review by this group identifies any snubbers and ensures the addition of snubber to DTS 0020-01, Snubber Visual Inspection Acceptance Criteria. Also, the current revision of DAP 10-02, 10 CFR 50.59 Review Screenings and Safety Evaluations, requires a more thorough review of Technical Specifications than the revision used in 1988.

A review of all Unit 2 and 3 modifications that affect snubbers since 1980 will be performed to determine any additional snubbers that were added.

A complete list of the snubbers added as a result of the Torus Attached Piping Long Term Program evaluation will be reviewed to ensure all snubbers from this program have been added to the snubber program.

F. PREVIOUS OCCURRENCES:

A review of reportable events have indicated no other occurrences of this event have occurred.

G. COMPONENT FAILURE DATA:

This event does not involve any component failures.