

October 21, 1994

Commonwealth Edison Company
ATTN: Mr. J. Stephen Perry
Vice President
BWR Operations
Executive Towers West III
1400 Opus Place, Suite 300
Downers Grove, IL 60515

Dear Mr. Perry:

This refers to the system based instrumentation and control inspection (SBICI) conducted by Mr. D. S. Butler and others of this office from August 15 through September 16, 1994. The inspection included a review of activities authorized for your Dresden Nuclear Power Station, Units 2 and 3. This inspection focused on the design and configuration of selected instrumentation and control systems and components. We discussed our inspection findings with Mr. E. D. Eenigenburg and others of your staff at the conclusion of the inspection on September 16, 1994.

Areas examined during the inspection are identified in the report. The team assessed the design, implementation, and engineering and technical support (E&TS) relative to selected instrumentation and control (I&C) systems. The inspectors selectively reviewed the setpoint program, design calculations, relevant procedures, representative records, installed equipment, and interviewed engineering and technical support staff.

The team considered the design and operation of the I&C systems reviewed and I&C engineering technical support to be adequate. The team identified several positive attributes. The most notable was that the recent setpoint methodology used was technically sound and reflected current industry practices.

The team identified weaknesses in I&C design control, specifically setpoint calculations. In addition, the team noted that efforts in ensuring the proper integration of design, construction and system engineering in the I&C area appeared minimal. Ownership of I&C systems, including system design, was not well defined due to ineffective communication and weak interaction between the various engineering departments. One noticeable consequence of this lack of integration was the observed slow progression from program conception to implementation of engineering initiatives. For example, engineering was slow in identifying and correcting performance problems with the Yarway level switches. In addition, following the exit meeting, it was brought to the team's attention that Dresden's instrument and control mechanics (IMs) had altered safety related air line routings during field installations. The IMs did not notify engineering about the changes. The failure to follow approved installation drawings could have resulted in safety related equipment failure. This concern is under review by the resident staff.

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Addressees - Letter Dated October 21, 1994

cc w/encs: J. C. Brons, Vice President
Nuclear Support
T. Nauman, Acting Station Manager
Unit 1
E. D. Eenigenburg, Station
Manager, Unit 2
R. Bax, Station Manager
Unit 3
P. Holland, Regulatory Assurance
Supervisor
D. Farrar, Nuclear Regulatory
Services Manager
Richard Hubbard
Nathan Schloss, Economist
Office of the Attorney General
State Liaison Officer
Chairman, Illinois Commerce
Commission

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October 21, 1994

During this inspection, certain of your activities were in violation of NRC requirements, as specified in the enclosed Notice. This violation is of concern because two examples of inadequate post modification testing (PMT) were identified. The first example involved unverified PMT acceptance criteria that was not based on applicable design documents. The second example involved a testing method that failed to detect other relay contact success paths (parallel contacts) during testing.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan 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. We also request that you respond in writing to inspection followup items 237/249/94016-01, -04, -05, -06, and -07 in this report.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, its 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,

/s/ D. S. Butler (for)

G. C. Wright, Chief
Engineering Branch

Docket No. 50-237

Docket No. 50-249

Enclosures: 1. Notice of Violation
2. Inspection Reports
No. 50-237/94016(DRS);
No. 50-249/94016(DRS)

See Attached Addressees

SEE ATTACHED CONCURRENCES

DOCUMENT NAME: G:DRE94016.DRS

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CE	RIII:DRS	RIII:DRS	RIII:DRS	RIII:DRP	N	RIII:DRS	N
NAME	Butler/kjc	Winter	Gardner	Hiland <i>PZH</i>		Wright <i>DRS for</i>	
DATE	10/ /94	10/ /94	10/ /94	10/21/94		10/21/94	

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NAME	Butler/kjc <i>QJB</i>		Winter <i>RW</i>		Gardner <i>ARH</i>		Hiland		Wright	
DATE	10/20/94		10/20/94		10/20/94		10/ /94		10/ /94	

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