U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-237/249-95007(DRP)

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

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Facility Name: Dresden Nuclear Power Station, Units 2 and 3

Meeting Conducted: March 9, 1995

Meeting Location: NRC Region III Office
801 Warrenville Road
Lisle, Illinois

Type of Meeting: Enforcement Conference

Inspection Conducted: Dresden Site
Morris, Illinois
January 25 to February 10, 1995

Inspectors: C. J. Phillips
A. M. Stone

Approved By: Patrick L. Hiland, Chief
Reactor Projects Section 1B

3/14/95
Date

Meeting Summary

Enforcement Conference on March 9, 1995 (Report No. 50-237/249-95007(DRP))
Areas Discussed: Three apparent violations identified during a special safety inspection were discussed, along with the corrective actions taken or planned by the licensee. The enforcement options pertaining to the apparent violations were also discussed with the licensee. The apparent violations concerned: (1) improper control of primary containment integrity, (2) recirculation pump restart in violation of technical specification requirements, and (3) inadequate instructions and/or failure to follow procedures associated with the above evolutions.

DETAILS

1. Persons Present at Conference

Commonwealth Edison Company

T Joyce, Site Vice President, Dresden
E. Eenigenburg, Unit 3 Station Manager, Dresden
J. Kotowski, Unit 2 Operations Manager
G. Tietz, Unit 3 Operations Manager
W. Sheldon, Unit 2 Maintenance Superintendent
S. Barrett, Radiation Protection Manager

U. S. Nuclear Regulatory Commission

H. Miller, Deputy Regional Administrator, Region III
T. Martin, Deputy Director, Reactor Projects, Region III
B. Clayton, Acting Deputy Director, Reactor Projects, Region III
P. Hiland, Chief, Reactor Projects, Section 1B, Region III
M. Jordan, Chief, Operator Licensing, Section 1, Region III
R. DeFayette, Director, Enforcement and Investigation Coordination Staff, Region III
M. Leach, Senior Resident Inspector, Dresden, Region III
C. Phillips, Resident Inspector, Dresden, Region III
R. Capra, Director, Project Directorate III-2, NRR
J. Stang, Project Manager, Project Directorate III-2, NRR
M. Satorius, Enforcement Specialist, OE

2. Enforcement Conference

An Enforcement Conference was held in the Region III office on March 9, 1995. The conference was conducted to address three apparent violations: (1) improper control of primary containment integrity, (2) recirculation pump restart in violation of technical specification requirements, and (3) inadequate instructions and/or failure to follow procedures associated with the above evolutions. The inspection findings were documented in Inspection Report 50-237/249-95004(DRP) which was transmitted to the licensee by letter dated February 17, 1995.

The purpose of the conference was to: (1) discuss the apparent violations, causes, and the licensee's corrective actions; (2) determine if there were any escalating or mitigating factors; (3) obtain information which would help determine the appropriate enforcement action; and (4) provide any additional information developed subsequent to the inspection noted above.

Regional representatives presented a brief description of the pertinent facts that led to the apparent violations, the regulatory requirements, and potential safety significance of the event. Licensee representatives provided a description of the sequence of events, the apparent violations, the safety significance, root cause analysis, and corrective actions.

At the conclusion of the conference, the licensee representatives were informed that they would be notified in the near future of final enforcement actions.

Attachments:
1. NRC Presentation
2. ComEd Presentation

U.S. NUCLEAR REGULATORY
COMMISSION

REGION III

ENFORCEMENT CONFERENCE

COMMONWEALTH EDISON

DRESDEN STATION

MARCH 9, 1995
10:00 A.M. (CST)

REPORT NUMBER 50-237/249-95004
EA NUMBER 95-030

NRC REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS

DRESDEN STATION
ENFORCEMENT CONFERENCE AGENDA
MARCH 9, 1995

INTRODUCTION AND MEETING PURPOSE
H. Clayton, Acting Deputy Director, DRP

ENFORCEMENT PROCESS
R. DeFayette, Director EICS

APPARENT VIOLATIONS SUMMARY
M. Leach, Senior Resident Inspector

LICENSEE PRESENTATION AND DISCUSSION

CLOSING REMARKS
H. Miller, Deputy Regional Administrator

THREE APPARENT VIOLATIONS

1. T.S. 3.7.A.2,

   Primary Containment Integrity

   - January 6 primary containment boundaries were broken in error for testing

   - Required LLRT was not performed

   - Identified through site engineering review

   - February 3 LLRT result could not be quantified

2. T.S. 3/4.6.H.5,

Recirculation Pump Restart Limitations

- 2B recirculation pump tripped due to maintenance error

- Temperature differential between reactor vessel steam space coolant and the bottom head drain coolant was greater than 145°F

- Operator workarounds - The bottom head drain was plugged for years

- Engineering and management were not consulted

- Non-conservative decision making by operating crew

3. 10CFR 50, Appendix B, Criterion V,

Instructions, Procedures and Drawings

- Instructions not adequate for locating and removing access plate **outside** the primary containment boundary

- Procedure inadequate and/or lack of adherence to isolate seal purge flow to the idle recirculation loop

- Recirculation pump restart procedure did not match the requirement of plant T.S.

DRESDEN UNITS 2 & 3

INSPECTION REPORT 50-237/249-95004

ENFORCEMENT BOARD

FEBRUARY 16, 1995

ITEM 1 - CONTAINMENT BREECH

ITEM 2 - RECIRC PUMP START

ITEM 1 - CONTAINMENT INTEGRITY BREECH

ESCALATED ENFORCEMENT
BOARD PACKAGE

1. Facility: DRESDEN

   Unit(s): Unit 3

   Docket No(s): 50-249

   License No(s): DPR 25

   Insp. Dates: February 6 - 10, 1995

   Lead Inspector: Charles Phillips

LER 95-005

BRIEF SUMMARY OF EVENT(S)

* January 6, 1995, an operator performed Dresden Operating Surveillance (DOS) 1600-13 on Unit 3. The surveillance was an operational verification of a check valve in the reactor building to torus vacuum breaker line.

* The surveillance was performed incorrectly. The operator opened an access plate to the check valve hinge pin and broke the primary containment boundary. The correct method was to open a different access plate outside the containment boundary. The valve was returned to service without a type B LLRT.

* Engineering had been performing this surveillance for the last two years. When it was reviewed by the IST coordinator, on February 3, 1995, Operations was questioned as to how the surveillance was performed.

* When it was determined on Feb. 3rd that the procedure was performed incorrectly a LLRT was performed on both the 31A and 31B valves. Both valves failed with indeterminately high leakage rates. Sixty percent of L_a is 488 SCFH.
  (a full scale of 86 SCFH

* There was an air operated valve upstream of both these valves. The leakage past the AOV was about 2-5 SCFH. However, this valve fails open on a loss of instrument air. Instrument air at Dresden would be lost within minutes of a loss of offsite power.

DRESDEN CONTAINMENT BREECH

Discussion:

The licensee failed to implement corrective actions to prevent recurrence of a problem that resulted in exceeding the technical specification limits for type B & C primary containment leakage.

On January 6, 1995, operations performed Dresden Operating Surveillance (DOS) 1600-13, "Suppression Chamber to Reactor building Vacuum Breaker Full Stroke Exercise Test" on both 3-1601-31A & B valves. The operator improperly performed the surveillance. The operator was required to open an inspection hatch upstream of the check valve and check it's operation with a broom handle. Instead, the operator performed the surveillance the way it used to be performed which was to remove an access plate for the check valve hinge pin and use a socket tool to open the valve. The access plate he opened was part of the primary containment boundary. When the operator reinstalled the plate, a type B local leak rate test (LLRT) was not performed on either 31A or 31B.

This was discovered on February 3, 1995, by site engineering. Engineering had performed this test for Operations for about two years. Engineering was aware that the test was due but had not been contacted. Engineering asked about the performance of the test and was told when and how it was performed. Engineering performed LLRTs on February 3 which failed. The leak rates at both of the flanges were indeterminately high.

This problem was identified by the licensee in the past. The resident inspectors became aware of the problem through a review of corrective actions in an LER. The licensee was previously cited in Inspection Report 94014 for the failure to conduct Type-B LLRTs. The past violation required no response because the licensee had already changed the surveillance procedure so as not to operate the valve by removing the access plate that was part of the primary containment boundary.

History:

Unit 3 had technically "inoperable" primary containment isolation boundaries for the majority of the time between 1987 and 1994.

The Unit 3 reactor building to torus vacuum breaker check valves (3-1601-31A&B) have flanges that cover the valves hinge pins. These flanges are primary containment boundary penetrations.

DRESDEN CONTAINMENT BREECH

From 1987 to 1992, a surveillance verified the valves operability by removing the flange and cycling the valve quarterly. The flanges were then reinstalled. However, local leak rate tests were not performed to check the penetrations as required by 10 CFR 50, Appendix J. A 1987, on-site review determined that the flanges were not part of the primary containment and the surveillance procedure was changed to remove the requirement to perform a LLRT. A 1989, LLRT of the 3-1601-31B valve was 159 SCFH. An investigation revealed that the 1987 on-site review decision was incorrect. A corrective action from that investigation was to evaluate using a downstream access port to cycle the valve.

The surveillance procedure was not changed to use the downstream access port until October 1992 and, no change was made to the existing procedure to perform LLRTs after the flange was removed and replaced. However, even after the procedure was changed, no effort was made to LLRT the flanges until the as-found tests were performed for 3DR13 in March 1994. The as-found for the March 1994, LLRT on 3-1601-31B was 257 SCFH. This in combination with other type B and C leakage exceeded the technical specification limit of 488 SCFH (0.6 La).

2. [x] A Notice of Violation (without "boilerplate"), including recommended severity levels, is attached.

   [x] This NOV has been reviewed by the Branch Chief or Division Director and each violation includes appropriate specificity including how and when the requirement was violated.

3. [x] Copies of the appropriate technical specifications or license conditions are attached.

4. Identify the enforcement policy supplement(s) that best fits the violation(s):

   Supplement 1.C.1.(b) & Supplement 1.C.2.(a)

   ITEM 1 & ITEM 2 = Supplement 1.C.7

DRESDEN CONTAINMENT BREECH

5. What is the apparent root cause of the problem? (NOTE: If the root cause is programmatic maintenance deficiencies, escalation of any civil penalty will be considered.)

Poor corrective actions requiring procedural changes.

6. What actions have been taken by the licensee to correct the specific violation(s)?

When the problem was found, the licensee entered Technical Specification 3.0.A, which required the unit to be in hot shut down in 12 hours. When the flanges failed, the unit began a shutdown. When the flanges were repaired and LLRT's were passed, the shutdown ceased.

7. Briefly state the message that should be given to the licensee through this enforcement action.

Corrective actions at the station are poor. Communications between departments are poor.

DRESDEN CONTAINMENT BREECH

8. Factual information related to civil penalty **ESCALATION** or **MITIGATION** factors:

a. IDENTIFICATION AND REPORTING:

Violations were identified by licensee; an SEC engineer identified the problem during an engineering review of the surveillance.

Reported? **Yes** (If so, LER #) **ENS Call**

Report required? **Yes**

b. CORRECTIVE ACTION TO PREVENT RECURRENCE;

UNKNOWN

c. PAST PERFORMANCE:
(For two years or covering last two inspections, whichever is greater.)

Violation 50-249/94014-05(DRP)
10 CFR 50, Appendix J, Section III, D.2.

Pertinent SALP category and rating for last two SALP periods.

Operations 3,3

Engineering 3,3

d. PRIOR NOTICE OF SIMILAR EVENTS:

Did the licensee have prior knowledge of this problem as result of review of specific NRC or industry notification, and fail to take effective preventive steps? **Yes**

Between 1987 and 1994 the lisensee was unable to take effective corrective action.

e. MULTIPLE OCCURRENCES:

Were multiple examples of a particular violation identified during this inspection? **Yes**

If yes, identify the violation and number of examples:

Both the 31A and 31B valves were found outside limits.

f. DURATION:

How long did the violation(s) exist? **28 days**

When did the licensee become aware of the violation(s)?

February 3, 1995

Should the licensee have been aware of the problem earlier? **No**

g. SAFETY SIGNIFICANCE:

The upstream containment isolation valves are designed to fail open on a loss of instrument air. On a loss of offsite power the instrument air system would have depressurized in minutes. In an accident scenario with a loss of offsite power primary containment integrity (0.6 La) would have been lost.

ISSUE 1 - TECH. SPEC. 3.7.A.2.b.(2)(a)

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

(1) An overall integrated leakage rate for Type A tests of:

(a) L_{am} less than or equal to 75 percent of L_a.

(b) L_{tm} less than or equal to 75 percent of L_t.

(2) (a) A combined leakage rate of less than or equal to 60 percent of L_a for all testable penetrations and isolation valves subject to Type B and C tests except for main steam isolation valves.

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

DRESDEN CONTAINMENT BREECH

ITEM 1 NOTICE OF VIOLATION

1. Technical Specification 3.7.A.2.b.(2).(a) states in part that when primary containment integrity is required, primary containment leakage rates shall be limited to ... a combined leakage rate of less than or equal to 60 percent of L_a for all testable penetrations and isolations valves subject to Type B and C tests.

Corrective Action Problem from previous occurrence

Contrary to the above on January 6, 1995, the primary containment boundaries on valves 3-1601-31A & B were broken, and when tested on February 3, 1995, the leakage rates were found to be indeterminately high. These results exceeded 60 percent of L_a for Type B and C leakage on Unit 3.

2. 10 CFR 50, Appendix B, Criterion XVI, states in part that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

   Contrary to the above, on January 6, 1995, a flange that was part of the primary containment boundary was removed and reinstalled on valves 3-1601-31 A & B but no Type B local leak rate test was performed. On August 24, 1994, the licensee was issued violation 50-249/94014-05 for failing to perform Type B local leak rate tests on the same containment boundary flanges.

3. Dresden Operating Surveillance (DOS) 1600-13, "Suppression Chamber to Reactor building Vacuum Breaker Full Stroke Exercise Test," Revision 7, required that the 3-1601-31A & B valves be checked by removing an access plate outside the primary containment boundary and cycling the valve with an extension tool.

   Contrary to the above, on January 6, 1995, DOS 1600-13, Revision 7, was inadequate in that the operator followed the procedure as written and tested the 3-1601-31A&B valves by opening an access plate that was part of the primary containment boundary.

ITEM 2 - RECIRC PUMP START

ESCALATED ENFORCEMENT
BOARD QUESTIONNAIRE

1. Facility: Dresden

   Unit(s): Unit 2

   Docket No(s): 50-237

   License No(s): DPR-19

   Insp. Dates: Jan. 23 - Feb. 10, 1995

   Lead Inspector: Charles Phillips

BRIEF SUMMARY OF EVENT(S)

* 2B recirculation pump tripped because instrument maintenance technicians worked on the wrong motor generator set temperature control valve.

* Operations realized that the procedural requirement to have less than a 145 degree temperature differential between the bottom head thermal couple and the reactor steam space prior to pump restart could not be met.

* Operations realized that the technical specification requirement to have less than a 145 degree temperature differential between the bottom head drain line coolant and the steam space could not be met.

* Pump restart procedure temperature requirements differed from the technical specification requirements.

* Shift personnel decided that using different temperature indications met the intent of the technical specifications.

* A site quality verification inspector was present in the control room and questioned the operators as to whether their course of action was in compliance with the procedure prior to the pump restart.

* Seal purge flow to the 2B recirculation pump was never secured. The pump trip procedure required isolating seal purge flow if the pump was not restarted within an hour.

* The pump was restarted 2 hours and 22 minutes after the trip using temperature indications that were not listed in either the procedure or the technical specification. Operations

management, station management, and engineering advice and consent were not sought or obtained prior to the pump start.

* In the last 12 months the NRC has identified 19 examples of the licensee failing to follow procedure and two examples of inadequate procedures. Eight of these examples were within the operations department and five of those examples were by licensed operators. **The NOV's are attached at the end of this package.**

Discussion:

On January 10, 1995, instrument maintenance was performing troubleshooting on the 2A recirculation pump motor generator set temperature control valve (TCV) controller. The technicians went to the wrong controller. The technicians closed the TCV for the 2B recirculation pump motor generator. The motor generator (MG) tripped on high temperature resulting in the loss of the 2B recirculation pump.

The cause of the recirculation pump trip was quickly identified as the maintenance error on the TCV. The operators were preparing to start the 2B recirculation pump when it was discovered that the pump start procedure could not be met. Dresden Operating Procedure (DOP) 0202-01, "Unit 2 Reactor Recirculation System Startup," Revision 14, stated that prior to starting a second pump verify the following temperature limitations, "If reactor pressure is greater than or equal to 25 psig, then reactor vessel bottom head thermocouple temperature is within 145 degrees of the steam space temperature." Technical specification 3.6.H.5 states, "An idle recirculation pump shall not be started unless the temperature differential between the reactor vessel steam space coolant and the bottom head drain line is less than or equal to 145 degrees." The temperature differences between the bottom head drain line and steam space, and the bottom head and the steam space were both greater than 145 degrees. However, the temperature differences were greater than 145 degrees while the pumps were still operating. Thus the restart of the pump was technically not possible via the technical specifications or the procedure.

The shift determined that alternate temperature indications could be used to meet the technical specification and procedural intent. A site quality verification inspector present in the control room pointed out the procedural problem to the operating crew prior to the pump start. The operators interviewed all stated that the problem had been discussed and the course of action agreed upon. However, there appeared to be a difference between what the reactor operator understood and what the unit supervisor understood. The unit operators log stated that the temperature difference between the bottom head and the active recirculation loop discharge

temperature was used and was less that 145 degrees. The shift managers log stated that the temperature difference between the running recirculation pump discharge and the steam space was used. The shift managers log also stated that this temperature differential met the intent of the technical specification.

The shift did not isolate seal purge flow to the 2B recirculation pump. The pump trip procedure stated that if the pump was not planned to be restarted within an hour than isolate the seal purge flow. The purpose for isolating seal purge flow was that the loop cooled down at about 22 degrees per hour with seal purge flow on and also may not be seen by the operator because the loop has spots below the thermocouple. In fact, the idle loop recirculation discharge temperature did take an eight degree step change downward when the pump was started. However, the loop to loop differential temperature was still within technical specification requirements.

The licensee has demonstrated significant problems in the preparation and adherence to procedures. Technical Specification Amendment 127 which introduced the requirement to verify differential temperatures from the drain line coolant to the steam space became effective on July 17, 1994. The procedure revision that was intended to implement the technical specification requirements did not agree with the technical specifications and were not made until November 3, 1994. In addition, there was no documentation that the operations department was ever trained on the procedure change. Over the past 12 months the NRC identified 19 examples of failing to follow procedure and inadequate procedures.

2. [x] A Notice of Violation (without "boilerplate"), including recommended severity levels, is attached.

   [x] This NOV has been reviewed by the Branch Chief or Division Director and each violation includes appropriate specificity including how and when the requirement was violated.

3. [x] Copies of the appropriate technical specifications or license conditions are attached.

4. Identify the enforcement policy supplement(s) that best fits the violation(s):

   Supplement I.C.7

RECIRC PUMP START

5. What is the apparent root cause of the problem?

Operators have a long standing belief that technical and procedural problems can be worked aro2und.

Station has an ineffective training program.

6. What actions have been taken by the licensee to correct the specific violation(s)?

* **Operations manager talked to the unit supervisor and the shift manager about procedural adherence the week of January 10.**

* **Operations managers began talking to crews about procedural adherence during weekly operations discussions.**

* **The shift operations supervisor held a meeting with the shift managers on January 25 on human performance problems and used the 2B MG set problem as an example.**

* **Shift operations supervisor sent a message via electronic mail to all shift managers that discussed the technical specifications as a matter of law. It was re-emphasized that 100 percent procedure adherence is expected.**

* **The Vice President of BWRs held a lengthy discussion with upper station management that detailed his disappointment with the way the event was reviewed.**

* **Station management designated a full root cause analysis team on January 28.**

* **All-station meetings were conducted on February 8 by the station managers concerning the importance of procedural adherence.**

* **SEE LER 50-237-95003-00**

7. Briefly state the message that should be given to the licensee through this enforcement action.

Procedural and technical specification adherence is required for safe operation of the plant.

RECIRC PUMP START

8. Factual information related to civil penalty **ESCALATION** or **MITIGATION** factors:

a. IDENTIFICATION AND REPORTING:

Violation(s) identified by licensee or NRC? **Licensee/NRC**

The licensee identified after the fact that the procedure and technical specifications were not met.

Reported? **Yes** (If so, LER #) **50-249-95003-00**

Report required? **Yes**

b. CORRECTIVE ACTION TO PREVENT RECURRENCE;

SEE LER

c. PAST PERFORMANCE:

Numerous NOVs issued last 12 months for procedural adherence problems. See HANDOUT.

Identify pertinent SALP category and rating for last two SALP periods.

Operations 3,3

d. PRIOR NOTICE OF SIMILAR EVENTS:

Did the licensee have prior knowledge of this problem as result of review of specific NRC or industry notification, and fail to take effective preventive steps?

If yes, describe:

e. MULTIPLE OCCURRENCES:

f. DURATION:

g. SAFETY SIGNIFICANCE:

3.6 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.6 SURVEILLANCE REQUIREMENT (Cont'd.)
g. The MAPLHGR Operating Limit shall be reduced by the appropriate multiplicative factor from the Core Operating Limits Report (Specification 3.5.I). If, concurrently, one Automatic Pressure Relief Subsystem relief valve is out-of-service, the MAPLHGR Operating Limit shall be reduced by the appropriate multiplicative factor from the Core Operating Limits Report.	
4. With no reactor coolant system recirculation loops in operation, reduce core thermal power to less than 25% of rated within 2 hours and place the unit in hot shutdown within the following 12 hours.	
5. Idle Recirculation Loop Startup An idle recirculation pump shall not be started unless the temperature differential between the reactor vessel steam space coolant and the bottom head drain line coolant is less than or equal to 145°F*, and:	5. Idle Recirculation Loop Startup The temperature differentials and flow rates shall be determined to be within the limits within 15 minutes prior to startup of an idle recirculation loop.
a. When both pumps have been idle, unless the temperature differential between the reactor coolant within the idle loop to be started up and the coolant in the reactor pressure vessel is less than or equal to 50°F, or	
b. When only one loop has been idle, unless the temperature differential between the reactor coolant within the idle and operating recirculation loops is less than or equal to 50°F and the speed of the operating pump is less than or equal to 43% of rated pump speed.	
I. Snubbers (Shock Suppressors)	I. Snubbers (Shock Suppressors) The following surveillance requirements apply to safety related snubbers.

*Only applicable with reactor pressure vessel steam space pressure ≥ 25 psig.

ISSUE 2 - NOTICE OF VIOLATION

1. Technical Specification 4.6.H.5 states in part that the temperature differential between the reactor vessel steam space and the bottom head drain line coolant must be verified to be less than 145 degrees within 15 minutes prior to starting a recirculation pump in an idle loop.

   Contrary to the above, on January 10, 1995, the 2B recirculation pump was started in an idle loop when the bottom head coolant drain line temperature was not within 145 degrees of the reactor vessel steam space temperature.

2. Technical Specification 6.2.A.1 states in part that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 4.a recommends startup procedures for the recirculating system.

   a. Technical Specification 4.6.H.5 states in part that the temperature differential between the reactor vessel steam space and the ***bottom head drain line coolant*** [EMPHASIS ADDED] must be verified to be less than 145 degrees within 15 minutes prior to starting a recirculation pump in an idle loop.

      Dresden Operating Procedure (DOP) 0202-01, "Unit 2 Reactor Recirculation System Startup," Revision 14, step G.10 states in part that if starting a second recirculation pump, then within 15 minutes of starting the pump verify that the bottom head thermocouple temperature is within 145 degrees of the steam space temperature.

      Contrary to the above, when the 2B recirculation pump was started on January 10, 1995, the procedure did not meet the requirements of the technical specification.

   b. Dresden Operating Abnormal (DOA) 0202-01, "Recirculation Pump Trip - One or Both Pumps," Revision 10, step D.12 states, "If idle loop starts are not planned within one hour, then isolate seal purge flow to the idle loop per DOP 0202-11."

      Contrary to the above, on January 10, 1995, the 2B recirculation pump tripped and was restarted 2 hours and 22 minutes later without securing seal purge flow.

ISSUE 1 & 2 NOTICE OF VIOLATION

Technical Specification 6.2.A.1 states in part that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 4.a recommends startup procedures for the recirculating system.

a. Technical Specification 4.6.H.5 states in part that the temperature differential between the reactor vessel steam space and the bottom head drain line coolant must be verified to be less than 145 degrees within 15 minutes prior to starting a recirculation pump in an idle loop.

Dresden Operating Procedure (DOP) 0202-01, "Unit 2 Reactor Recirculation System Startup," Revision 14, step G.10 states in part that if starting a second recirculation pump then within 15 minutes of starting the pump verify that the bottom head thermocouple temperature is within 145 degrees of the steam space temperature.

Contrary to the above, when the 2B recirculation pump was started on January 10, 1995, the procedure did not meet the requirements of the technical specification.

b. Dresden Operating Abnormal (DOA) 0202-01, "Recirculation Pump Trip - One or Both Pumps," Revision 10, step D.12 states, "If idle loop starts are not planned within one hour, then isolate seal purge flow to the idle loop per DOP 0202-11."

Contrary to the above, on January 10, 1995, the 2B recirculation pump tripped and was restarted 2 hours and 22 minutes later without securing seal purge flow.

c. Dresden Operating Surveillance (DOS) 1600-13, "Suppression Chamber to Reactor building Vacuum Breaker Full Stroke Exercise Test," Revision 7, required that the 3-1601-31A & B valves are checked by removing an access plate outside the primary containment boundary and cycling the valve with an extension tool.

Contrary to the above, on January 6, 1995, DOS 1600-13, Revision 7, was inadequate in that the operator followed the procedure as written and tested the 3-1601-31A&B valves by opening an access plate that was part of the primary containment boundary.

Written right!
Just not clear enough.