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Dresden Generating Station
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ComEd

April 17, 1995

TPJLTR 95-0045

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

Licensee Event Report 95-010, Docket 50-237 is being
submitted as required by Technical Specification 6.6, NUREG
1022 and 10CFR50.73(a)(2)(i)(B).

Sincerely,



Thomas P. Joyce
Site Vice President

TPJ/:pt

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 2	DOCKET NUMBER (2) 05000237	PAGE (3) 1 OF 3
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TITLE (4)
Technical Specification Requirement 6.12.2 Not Implemented Into Station Activities Due to Maximum Allowable Stay Time Not Specified on RWP

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
03	22	95	95	-- 010 --	00	04	12	95	None	
									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	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71(b)	
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(v)	<input checked="" type="checkbox"/> OTHER	
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)	
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)			
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME Patrick D. Quealy	Ext. 2492	TELEPHONE NUMBER (Include Area Code) (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

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	<input type="checkbox"/> NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

This LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B). With the increased focus on procedural adherence at Dresden Station, a Radiation Protection Technician was performing a review of DAP 12-4 in order to ensure that the procedure was workable per DAP 9-13. The Radiation Protection Technician informed her supervisor that the Department was not in procedural adherence with DAP 12-4 and Technical Specification 6.12.2. The requirement not being met was the specification of the maximum allowable stay time being stated in the RWP for areas with dose rates greater than 1000 mrem/hour (locked high rad areas). The stay time requirement was interpreted as being met by the use of the electronic dosimeters(ED), which are issued for each entry into the high radiation areas.

The safety significance of this event is minimal. The electronic dosimeters issued for entry into the high radiation areas perform the radiological monitoring function for the individuals. The time in the area is controlled via the alarm set point of the ED.

In order to meet this requirement a Radiation Protection Department policy RWP-02 was written specifying how to calculate a maximum allowable stay time. This calculation is being performed for each work group entering a locked high rad area.

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)
Dresden Nuclear Power Station, Unit 2		05000237	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
			95	-- 010 --	00
					2 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT IDENTIFICATION:

Technical Specification Requirement 6.12.2 Not Implemented Into Station Activities Due to Maximum Allowable Stay Time Not Specified on RWP

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2 Event Date: 03/22/95 Event Time: 1530
 Reactor Mode: Refuel Mode Name: Refuel Power Level: 0
 Reactor Coolant System Pressure: psig

B. DESCRIPTION OF EVENT:

This LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

While reviewing procedure DAP 12-04, Control of Access to High Radiation Areas and Very High Radiation Areas, a Radiation Protection Technician(RPT) determined that, the R.P. Department, was not in compliance with this procedure. During the investigation into this issue it was determined that the maximum allowable stay times were a Technical Specification requirement. This was identified in the Dresden Technical Specification section 6.12, High Radiation Area, subsection 2 (6.12.2)

The Technical Specification 6.12.2 states "...Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area."

Procedure DAP 12-4 Step E.2. states "...all areas >1rem/hour (including >15 rem/hour areas) shall remain locked except during periods of authorized entry. Entry shall be controlled by an RWP that specifies dose rates in the work area and maximum allowable stay time."

The requirement for stay times was put into DAP 12-4 under Revision 18, which was effective 4/19/93. The requirement was interpreted by the Radiation Protection Department as being met by the use of the electronic dosimeters, which are issued for each entry into the high radiation areas. Access control and the ED would determine the stay time based on when you reached the ED alarm set point. Upon review of the Technical Specification and the interpretation, it was determined to be unacceptable because the procedure and the Technical Specification specifically state that the stay time shall be in the RWP.

A Radiation Protection Department policy was written to provide guidance to the supervisors on the calculation of the maximum allowable stay time. This stay time is then documented on a RWP Information Sheet and Stay Time Log and placed in the RWP.

MRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
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					3 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

C. CAUSE OF EVENT:

This LER is being submitted in accordance with 10CFR50.73(a)(2)(i)(B) which requires that within thirty days after the discovery of the event, the licensee shall report...any operation or condition prohibited by the plant's Technical Specifications. The inappropriate action which occurred was the incorrect interpretation of a Technical Specification and procedural requirement.

The failure mode which allowed this event to occur was that the change in the procedure was put in place without proper understanding of the Technical Specification requirement. It was believed that the ED met the procedural and Technical Specification requirements.

D. SAFETY ANALYSIS:

The safety significance of this event is minimal. The electronic dosimeters issued for entry into the high radiation areas perform the radiological monitoring function for the individuals. The time in the area is controlled via the alarm set point of the ED which is set to alarm at eighty percent of the allowable dose. This alarm would correlate to approximately eighty percent of the maximum allowable stay time.

E. CORRECTIVE ACTIONS:

A Radiation Protection Department policy was written to provide guidance to the supervisors on the calculation of the maximum allowable stay time. This stay time is then documented on a *RWP Information Sheet and Stay Time Log* and placed in the RWP.

Evaluating Technical Specification section 6.12.2 for possible revision.

A better method of informing the department of procedural changes is being determined.

F. PREVIOUS OCCURRENCES:

None

G. COMPONENT FAILURE DATA:

None