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Dresden Generating Station
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ComEd

June 5, 1995

TPJLTR 95-0058

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

Licensee Event Report 95-012, Revision 01, Docket 50-237 is
being submitted as required by Technical Specification
6.11.1 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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PDR ADOCK 05000237
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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 (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)
Dresden Nuclear Power Station, Unit 2

DOCKET NUMBER (2)
05000237

PAGE (3)
1 OF 4

TITLE (4)
Significant Weakness of Administrative Control of Radioactive Material Identified Due to Radioactive Material Being Found Outside the Protected Area

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	
04	11	95	95	-- 012 --	01	05	25	95	Dresden Unit 3	0500249	
									Dresden Unit 1	0500010	

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
		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)
POWER LEVEL (10)	000	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	TELEPHONE NUMBER (Include Area Code)
Patrick D. Quealy, Health Physicist	Ext. 2492 (815) 942-2920

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)

X YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
			09	15	95

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

The Supplement is being submitted to document the investigation results, and the corrective actions identified during investigation. The LER was submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B) and Technical Specification 6.11.1. While performing an investigation of Radioactive Material found outside the Radiologically Posted Area, the investigative team was notified that a contaminated item was found in the Training Building on April 11, 1995, at approximately 1100 hours. Upon investigation, a total of fourteen contaminated items were identified outside the fence. This is indicative of a weakness of administrative control of contaminated material. The root cause for this event is a general lack of respect for radiation at the station. The causal factors are inadequate performance by RP Technicians in their work practices, poor worker accountability by First Line Supervision, and a lack of commitment for program implementation. The immediate corrective actions for this event were to control the material and perform detailed surveys of the protected and owner controlled areas. The safety significance for this event is considered minimal due to the low level of contamination found on the items.

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 (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)		DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)	
Dresden Nuclear Power Station, Unit 2		05000237		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
				95	-- 012 --	01	

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

EVENT IDENTIFICATION:

Significant Weakness of Administrative Control of Radioactive Material Identified Due to Radioactive Material Found Outside the Protected Area

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2 (3) Event Date: 04/11/95 Event Time: 1100
 Reactor Mode: N (N) Mode Name: Run (Run) Power Level: 100% (44%)
 Reactor Coolant System Pressure: 1000 (932) psig

B. DESCRIPTION OF EVENT:

While performing an investigation into Radioactive Material (RAM) found outside the Radiologically Posted Area (RPA), the investigation team was notified by training personnel that a contaminated item was found in the Training Building. The Training Building is located outside the protected area. Radiation Protection (RP) personnel were dispatched to control the contaminated item and perform a detailed survey of the building. A total of eight contaminated items were identified in this search. Six additional items were identified upon expansion of the investigation to cover additional areas outside the fence. This is indicative of a weakness of administrative control of contaminated material at the Station.

There were twenty-eight events concerning the control of radioactive material documented during 1993; there were thirty-eight events documented concerning the control of radioactive material during 1994; and seven events, including this investigation, have been documented during 1995.

The initial investigation for RAM outside the RPA was initiated when contaminated oil filters were found in the clean garbage building. This investigation included an immediate action of a detailed survey of the protected and owner controlled areas. RPTs and supervisors from other ComEd sites participated in this action. This investigation identified 465 contaminated items outside the RPA, all of these instances were within the protected area fence except for the 14 items described above. A comprehensive check of 100 items in the Storeroom that had been previously tagged for unconditional release was also performed; this identified no problems.

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

C. CAUSE OF EVENT:

The Supplement is being submitted to document the investigation results and corrective actions. The LER was submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the Plant's Technical Specification (Technical Specification 6.11.1). The root cause for this event is a general lack of respect for radiation at the station. The causal factors are inadequate performance by RP Technicians in their work practices, poor worker accountability by First Line Supervision, and a lack of commitment for program implementation. It should be noted that 63% of the problem items may be attributed to less than ideal background conditions existing at the location of survey. These items were found to have direct contamination in the 1-2K dpm/100cm² range.

D. SAFETY ANALYSIS:

The safety consequence for this event is considered minimal due to the low levels of contamination found on the items. The majority of all items identified outside the RPA were also found to contain low levels of contamination. The safety significance of the levels of contamination is minimal. The number of contaminated items found is a significant issue for the Station and aggressive actions were taken promptly to correct these deficiencies, including a site lockdown and comprehensive survey. The site lockdown involved strict administrative controls to prevent cross contamination of previously released areas.

E. CORRECTIVE ACTIONS:

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX).

The immediate corrective actions for this event were to; 1) Control the material and properly secure the items, 2) Perform a detailed survey of the protected and owner controlled areas. The number of contaminated items found is a significant issue for the Station and aggressive actions were taken promptly to correct these deficiencies. These actions included a site lockdown and comprehensive survey of the protected and owner controlled areas. The site lockdown involved strict administrative controls to prevent cross contamination of previously released areas. This lockdown remained in place until surveys and immediate corrective actions were implemented.

The following corrective actions have been initiated as part of the comprehensive investigation into this event. Additional actions are also currently under evaluation, and further information will be provided in the supplemental report by September 15, 1995. The supplemental report will also provide an update concerning the self-assessment described in action number four below. A summary of the corrective actions based on the results of the investigation follow:

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

1. RP Management and cross-sectional discipline teams will benchmark INPO 1 & SALP 1 plants for information and ways to better control contaminated materials. (NTS# 237-180-95-01200S01)
2. Establish Unconditional Release Criteria \leq 100 cpm background. Utilize a survey booth in a low background area with a sorting table. Utilize additional tool monitors as required. (NTS# 237-180-95-01200S02)
3. Establish an oil processing procedure for equipment use and controls for operations originating out of the Oil Processing Building. Procedures shall include radiation protection measures. (NTS# 237-180-95-01200S03)
4. Within 90 days of completing the investigation, the Investigation Core Team will complete an Effectiveness Review of the corrective actions in place. (NTS# 237-180-95-01200S04)
5. Initiate permanent RP Procedure Changes as required to address the concerns of the original Level II team for PIR 237-200-95-15500 concerning the Unconditional Release program. (NTS #: 237-180-95-01200S05)
6. Establish a sampling method for items that have been surveyed out of the RPA and are ready for release. (NTS# 237-180-95-01200S06)
7. Establish and implement a plan to reduce the number of outside RPAs and evaluate ways to disposition the contaminated material. (NTS# 237-180-95-01200S07)
8. The results of this Level II investigation will be included in each of the departments' continuing training cycle for all station employees. (NTS# 237-180-95-01200S08)

F. PREVIOUS OCCURRENCES:

A review of recent LERs indicate this is the first LER although several previous non-reportable events were identified.

G. COMPONENT FAILURE DATA:

NONE.