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Dresden Generating Station
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June 21, 1995

TPJ LTR. #95-0067

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

Subject: Dresden Nuclear Power Station Units 2 and 3 Response to Request for Update of Corrective Actions Associated with Violation 50-237/249-94002-04
NRC Docket Numbers 50-237 and 50-249

Reference: (a) D. Farrar letter to Director, Office of Enforcement, dated June 16, 1994, transmitting Commonwealth Edison Company's response to Notice of Violation regarding inadequate corrective actions associated with reactor water level instrumentation.
(b) Patrick L. Hiland letter to Thomas Joyce, dated May 22, 1995 transmitting NRC Inspection Report 50-237/95005; 249/95005.

Enclosed as Attachment 1 is ComEd's response to the request for an update of the corrective actions associated with Violation 50-237/249-94002-04. This update is being submitted as requested in the reference (a).

If your staff has any questions concerning this letter, please refer them to Peter Holland, Dresden Station Regulatory Assurance Supervisor, at (815) 942-2920, extension 2714.

Sincerely,

Thomas P. Joyce
Site Vice President
Dresden Station

TPJ/ks

Attachments: As described

cc: J. B. Martin, Regional Administrator, Region III
J. F. Stang, Project Manager, NRR (Unit 2/3)
P. B. Erickson, Project Manager, NRR (Unit 1)
M. N. Leach, Senior Resident Inspector, Dresden
File: NRC Inspection Report 50-010(237)(249)/94005

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ATTACHMENT 1
RESPONSE TO NRC INSPECTION REPORT
50-237(249)/95005

Dresden Station acknowledges that the corrective actions in reference (a) have not been adequate to ensure system engineers review and trend instrument out of tolerance data. These corrective actions focused on peripheral issues relating to the development and management of the database rather than ensuring the system engineer was tracking and analyzing data. This led to confusion among engineers as to who is responsible for review of out of tolerance data and created an environment where this activity is not being performed by all engineers. It is evident that other actions, in place of those outlined in reference (a), will have to be taken to ensure consistency and eliminate confusion amongst the engineers.

System Engineering Memo 25 was revised on July 8, 1994 as stated in reference (a). This revision has been reviewed and has been determined to contain insufficient information to establish clear guidance and expectations with respect to review of instrument out of tolerance events and use of the Integrated Reporting Process (IRP) database. An additional revision to System Engineering Memo 25 has been completed incorporating these expectations.

Contributing to the failure of engineers to trend IRP out of tolerance data, was the inconsistent data which was being recorded on PIF's for some instruments. To correct inconsistent data in the instrument out of tolerance portion of the IRP database, a review of all information entered into the database since January of 1995 has been performed. Inconsistent data has been identified and re-entered in a manner which will allow more consistent tracking. This information is presently being sorted by system and provided to individual System Engineers for evaluation. An individual has been assigned to review information being added to the database to assure consistency. Future enhancements to the IRP database will allow identification of adverse trends by manufacturer and model number. Until these enhancements can be made, copies of system out of tolerance reports are being supplied to component engineers for review and identification of adverse component trends. These practices are allowing more accurate trends of out of tolerance data to be established by Engineering personnel.

As a measure to ensure expectations for trending are understood, System Engineers who are responsible for the RPS, ECCS, ATWS and Reactor Vessel Instrumentation systems have been counseled on the expectation that review of IRP data on instrument out of tolerances will be performed. Additional instructions in the proper use of the computer database and use of special query programs developed for tracking instruments out of tolerance events by system and instrument were also provided. This activity was completed on May 5, 1995.

System Engineering Supervisors have also been counseled on the expectation that Engineers responsible for systems containing safety related instrumentation are to review out of tolerance data for adverse trends. Supervisors are providing additional overview of the review of instrument out of tolerance data trending performed by engineers. In addition, Site Quality Verification will perform quarterly surveillances of the tracking and trending program to ensure expectations are being met. These surveillances will continue until consistent and thorough reviews of data are being performed by individual engineers.

As a measure to trend system based performance, Dresden Station is in the process of implementing the Maintenance Rule in accordance with 10CFR50.65. The actions in progress by Dresden in response to this rule will identify systems where performance does not meet established goals. These systems will be investigated and appropriate corrective actions shall be taken.

In summary, Dresden station acknowledges that review of out of tolerance data was not being performed by all engineers as previously committed. Measures have been taken to assure adverse trends will be identified in the future. These measures include enhancements to the database used to track out of tolerance events, clarification of expectations to engineers, and increased awareness by supervision.