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August 11, 1995

TPJ LTR. #95-0093

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3 Responses to Notice of Violation; Inspection Report 237/95008; 249/95008  
NRC Docket Numbers 50-237 and 50-249

Reference: (a) P. L. Hiland letter to T. Joyce, dated July 12, 1995 transmitting Notice of Violation; NRC Inspection Report 50-237/95008; 249/95008.  
(b) E. G. Greenman letter to J. Stephen Perry, dated August 24, 1994, transmitting Inspection Report 50-010/94014; 237/94014; 249/94014.

Attached is ComEd's response to the referenced Notice of Violation regarding ineffective corrective actions. The violation identifies weaknesses in the corrective action program. Dresden has acknowledged the weaknesses in the corrective action program, and steps to improve this program are being implemented as part of the Dresden Focus Area plans. Controls have been added to the commitment tracking process to prevent the type of failure described in the Notice of Violation. In addition to the corrective actions in response to the Notice of Violation, we are continuing to examine previous commitments and corrective actions to ensure their proper implementation and closure. Dresden recognizes the importance of an effective corrective action program to achieve sustained long term performance improvement.

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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/cls

cc: H. J. Miller, 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)/95008

**ATTACHMENT**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-237(249)/95008**

**Violation:**

10 CFR 50, Appendix B, Criterion XVI, stated in part that conditions adverse to quality be identified and corrected. In the case of significant conditions adverse to quality corrective actions shall be taken to preclude repetition.

10 CFR 50.73 a.2.i.B required the licensee to report any operation or condition prohibited by the plant's technical specification.

Contrary to the above, the licensee failed to submit a written report describing local leak rate test failures which exceeded technical specification type B and C leakage limits during the 1994 Unit 3 refueling outage. A previous Notice of Violation (50-237/249-94014-06) was cited for the failure to report excessive leakage identified during the 1991 Unit 3 refueling outage. The corrective actions for this violation were inadequate and did not prevent recurrence.

**Reason for violation:**

Local leak rate testing (LLRT) of all primary containment isolation valves is performed during refueling outages. The total of the combined leakage for all primary containment isolation valves is limited to 60% of allowable containment leakage (0.6La) in accordance with 10 CFR 50 Appendix J and Technical Specification 3.7.A.2.b.(2)(a). During the D3R13 refuel outage, the total sum of containment maximum pathway leakage was found to exceed 0.6 La on March 12, 1994. At that time, the required notifications were made and the event reported within 30 days in accordance with 10 CFR 50.73 (reference Docket 50-249, Licensee Event Report 94-009). In order to determine the total leakage, additional valves required testing. The additional testing was not completed within the 30 day window for submittal of a final LER, therefore, it was necessary to submit a supplement describing the results and corrective actions for valves tested during the remainder of the refuel outage.

Dresden Station failed to submit the supplement to the LER in a timely manner. The engineering personnel assigned the responsibility of preparing the supplement were cognizant of the requirement and need to submit the supplement. However, they failed to assign the appropriate priority to the completion of the task.

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An additional causal factor was a procedural deficiency associated with the generation of tracking items for supplementing LERs. Although the LER Procedure (Dresden Administrative Procedure 02-08) required Nuclear Tracking System (NTS) entries be prepared for corrective actions described in LERs, it did not specify that commitments to submit a supplement to the LER be tracked.

In early 1994, Dresden was cited for another event in which an LER supplement was significantly overdue, reference (b). The root cause of the earlier event was that the NTS item tracking the supplement was extended several times without upper management knowledge. The corrective actions for the previous event were to require Department Head or designee concurrence for NTS extensions and enforce department head's responsibility for completion of commitments by the assigned due dates. In addition, NTS items reflecting commitments to the NRC may not be extended without concurrence from the Regulatory Assurance Supervisor. The adequacy of the procedure for preparation of LERs [Dresden Administrative Procedure 02-08] was not a contributing factor to the previous violation, and the corrective actions from the previous violation did not address the causes of the current event.

**Corrective steps taken and Results achieved:**

The supplement to LER 50-249/94-009 containing the listing of all valve failures and corrective actions during D3R13 was submitted on July 24, 1995.

A temporary procedure change to the LER preparation procedure has been implemented to require the generation of an NTS item when a supplement is required for an LER.

A review was performed of 1994 and 1995 LER submittals to identify if there were any similar failures to submit supplements and to ensure that the NTS items were assigned for corrective actions. Of the 85 LER's submitted during this time frame, 27 required supplements. Three additional failures to submit supplements were identified. In each of these cases, no NTS item had been initiated. Each of these cases involved the same organization within Engineering that had prepared LER 50-249-94-009 with the exception of one prepared by a new employee. All the remaining supplements had NTS tracking numbers assigned and those due to date have been submitted. Tracking numbers were assigned to ensure submittal of the three supplements. Two of the supplements were submitted on July 21, 1995; 50-237/94-002 and 50-237/95-001. The remaining supplement will be submitted by September 16, 1995.

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Commitments for corrective actions from 1994 and 1995 LER's were reviewed and it was determined that NTS tracking items were assigned.

**Corrective Steps Taken to Avoid further violation:**

The personnel involved in this event and in other instances of failure to timely submit LER supplements have been counselled, by supervision, on the importance of meeting commitments and providing supplemental responses on time.

This issue was discussed at an engineering staff meeting by the Site Engineering Manager to reinforce the importance of ensuring commitments are implemented and that the appropriate NTS items are generated.

The temporary procedure change requiring the initiation of an NTS item for supplements to LERs will be incorporated into a permanent procedure change by November 16, 1995.

To ensure accountability, quality, and timely implementation of corrective actions associated with LERs, a single point of responsibility for LERs will be established.

**Date when full compliance will be achieved:**

Full compliance was achieved with the submittal of the supplement to LER 249/94-009.