

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-237/249/95013(DRS)

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: November 2, 1995


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

Type of Meeting: Pre-Decisional Enforcement Conference

Inspection Conducted: Dresden Site
Morris, Illinois
August 22 to September 29, 1995

Inspector: P. L. Loudon

Approved By:


R. J. Caniano, Chief
Plant Support Branch 2


Date

Meeting Summary

Pre-Decisional Enforcement Conference on November 2, 1995 (Report Nos. 50-237/249/95013(DRS))

Areas Discussed: The purpose of the conference was to discuss events and circumstances surrounding a radioactive material shipment which was sent from the Dresden site on August 11, 1995, to a vendor processing facility in Oak Ridge, Tennessee. The shipment contained assorted piping and valves removed from the Reactor Water Cleanup System (RWCU) of Unit 2 as part of the scheduled pipe replacement project for the RWCU system. The shipment arrived at its destination exhibiting radiation levels in excess of the Department of Transportation open vehicle limit of 200 mrem/hr on contact.

DETAILS

1. Persons Present at Conference

Commonwealth Edison Company

J. S. Perry, Vice President, BWR Operations
J. Heffley, Units 2 and 3 Station Manager, Dresden
J. Howland, Assistant Radiation Protection Manager, Dresden
R. Stols, Director, Site Quality Verification, Dresden
D. Farrar, Regulatory Services Manager, Corporate
F. Rescek, Director, Nuclear Station Radiation Protection, Corporate
M. Friedmann, Lead Technical Health Physicist, Dresden
R. Bare, Quality Control Supervisor, Dresden
M. Mikota, RadWaste Coordinator, Dresden
H. Anagnostopulos, Radiological Assessment Group, Dresden
L. Ferguson, Radiation Protection Technician, Dresden
R. Thacker, Lead Technical Health Physicist, Braidwood
M. Marchionda, Lead Technical Health Physicist, Byron
R. Carson, Lead Technical Health Physicist, Quad Cities
M. Gierscher, Health Physicist, Braidwood
C. Herzog, Director, Radioactive Waste, Corporate
B. Gardner, Health Physicist, Zion
M. Hayworth, Health Physicist, Corporate
S. Morse, Health Physicist, Corporate
N. Chrissotimos, Supervisor, Regulatory Assurance, Quad Cities
T. Prendergast, Nuclear Licensing, Corporate
R. Rybak, Nuclear Licensing, Corporate
S. Trubatch, Attorney

U. S. Nuclear Regulatory Commission

H. Miller, Regional Administrator
J. Grobe, Acting Deputy Director, Division of Reactor Safety
R. Caniano, Chief, Plant Support Branch 2
P. Hiland, Chief, Reactor Projects Branch 1
B. Burgess, Director, Enforcement and Investigation Coordination Staff
J. Stang, Project Manager, NRR
C. Vanderniet, Senior Resident Inspector, Dresden
B. Berson, Regional Counsel
J. Hansen, Resident Inspector, Dresden
M. Mitchell, Reactor Engineer, Dresden
D. Hills, Reactor Inspector
P. Pelke, Enforcement Specialist
J. Hopkins, Reactor Engineer
R. Paul, Senior Radiation Specialist
P. Loudon, Radiation Specialist
R. Glinski, Radiation Specialist

2. Enforcement Conference

A Pre-Decisional Enforcement Conference was held at the request of the licensee in the Region III office on November 2, 1995. The conference was conducted to address an apparent violation involving a radioactive

material shipment sent from Dresden to a vendor processing facility. When the shipment arrived at the destination facility, it exhibited contact radiation levels in excess of Department of Transportation limits. The inspection findings were documented in Inspection Report No. 50-237/249/95011(DRSS) which was transmitted to the licensee by letter dated October 4, 1995. The purpose of the conference requested by the licensee was to: (1) discuss the apparent violation, causes, and the licensee's corrective actions; (2) determine if there were any escalating or mitigating factors; and (3) 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 violation, the regulatory requirements, and potential safety significance of the event. Following this presentation, the licensee acknowledged and agreed with the inspection findings. Licensee representatives provided a description of the sequence of events, the apparent violation, the safety significance, root cause analysis, and corrective actions. Some of the corrective actions included enhancing worker project ownership and accountability; work management prioritization improvements; procedure improvements; and enhancing radiation protection technician training. The slides used during the licensee's presentation are included as an attachment to this report.

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

Attachment: ComEd Presentation

ComEd

*RADIOACTIVE MATERIAL
SHIPPING EVENT*

ENFORCEMENT CONFERENCE

November 2, 1995

INTRODUCTION

Apparent Violation

- Failure to Meet DOT Shipping Limits
- No Safety Significance
- Lack of Ownership of Shipment

RWCU PROJECT

Background

- Special Project
- Team Established
- ALARA Plan

RWCU PROJECT

- RP Ownership Not Taken
- ALARA Plan Not Implemented
- Inadequate Contractor Oversight by Radiation Protection

IMMEDIATE CORRECTIVE ACTIONS

- Sent HP to Vendor Facility
- Stopped Packaging and Loading
- Stopped Shipments
- Promptly Initiated Root Cause Investigation

RESUMPTION OF PRODUCTION SHIPMENTS

- Re-established RP Ownership
- Prioritized Shipments
- Standards for Shipments
- Independent ComEd Shipping Group
- Corporate Assistance

SECOND EVENT

- Recalled Shipment to Site
- Different Root Cause
- Separate Corrective Actions

LONG TERM CORRECTIVE ACTIONS

- Ownership/Accountability
- Work Management
- Procedures
- Training

RP PROGRAM IMPROVEMENTS

- Human Resources
- Organization

CONCLUSION

- Shipping Program Ownership
- Two Events
- Working Improvement Plan

EVENT OVERVIEW

- Failure to Follow Procedure
- Guidelines Issued Contrary to Procedure
- No Question Why
- Qualification Based on OJT

QUALITY ORGANIZATION ASSESSMENT

- Ineffective Overview
- Need to Strengthen Performance
- Accelerate Improvement Efforts

EVENT-SPECIFIC CORRECTIVE ACTIONS

- Communication of Expectations
- Develop New Qualification Program
- Requalify Inspectors

QUALITY ORGANIZATION IMPROVEMENTS

- External Assessment
- Improvement Plan Development
- Standards and Expectations
- Senior Management Involvement