

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920



January 16, 1996

PGHLTR 96-0004

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

Licensee Event Report 95-023, Docket 50-249 is being submitted pursuant to 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

This correspondence contains the following commitments:

1. Site Engineering will revise DAP 21-03, Dresden Administrative Procedure for "Processing Plant Modifications". The revision will provide guidelines for partial installations of modifications and interactions with existing panels and equipment. Specific instructions will be provided to the installer in Part IV of the Engineering Change Notice, ECN. (NTS 249-180-95-02301)
2. Contract Maintenance will request Corporate Construction Services to revise NSWP E-01, Electrical Cable Installation and Inspection, to address cables pulled into panels and equipment that will not be terminated prior to the panel/equipment being returned to operation. The Cable Installation Checklist, E-01 Exhibit A will also be revised to add an attribute for cables pulled but not terminated. (NTS 249-180-95-02302)
3. Training will be conducted for the revision to NSWP E-01 with the following groups: electrical maintenance, site construction, instrument maintenance, work control, quality control, plant engineering and design engineering. (NTS 249-180-95-02303)

Sincerely,

Peter G. Holland
Regulatory Assurance Supervisor

PGH/MS:pt

Enclosure

cc: H. Miller, Regional Administrator, Region III
NRC Resident Inspector's Office
File/NRC
File/Numerical

9601190157 960116
PDR ADOCK 05000249
S PDR

L:\8360\8301\pghltr.96\0004.96

190026

IFP
11

NRC FORM 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95							
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 3					DOCKET NUMBER (2) 05000249			PAGE (3) 1 OF 4				
TITLE (4) Unsupported Cable in Panel 903-33 Could Have Rendered Safety Related Relays Inoperable During a Seismic Event Due To Inadequate Modification Package												
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		
12	19	95	95	-- 023 --	00	01	16	96	None			
OPERATING MODE (9)		N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
POWER LEVEL (10)		076		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)		
				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 Mark Schimmel, Contracted Maintenance						Ext. 3562		TELEPHONE NUMBER (Include Area Code) (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)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR		
YES (If yes, complete EXPECTED SUBMISSION DATE).				X NO								

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

On December 7, 1995, at 1400, an improperly restrained cable was found in the Emergency Core Cooling System, 903-33 panel located in the Auxiliary Electrical Equipment room. Actions were immediately taken (WR# 950116009) to restrain the cable by attaching it to existing structural supports within the panel. A follow up action was assigned to the Plant Engineering Department to determine the effects of the cable in its as found condition. On December 19, 1995 Plant Engineering determined that the relays within the 903-33 panel could have been rendered inoperable had a seismic event occurred.

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 3		05000249	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
			95	-- 023 --	00
					2 OF 4

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

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 MWT rated core thermal power.

EVENT IDENTIFICATION:

Unsupported cable in panel 903-33 could have rendered safety related relays inoperable during a seismic event due to inadequate modification package.

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: 12/19/95 Event Time: 1800 hrs
 Reactor Mode: N Mode Name: Run Power Level: 2521 MWT
 Reactor Coolant System Pressure: 1005 psig

B. DESCRIPTION OF EVENT:

This report is being submitted in accordance with 10CFR50.73(a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specification.

On December 7, 1995, at 1400, an improperly restrained cable was found in the Unit 3 903-33 panel in the Auxiliary Electrical Equipment room. A concern was raised that in a seismic event, the whip action of the cable could damage the ECCS LPCI/Core Spray relays within the 903-33 panel. Actions were immediately taken to restrain the cable by attaching it to existing structural steel within the panel (WR# 950116009 issued to perform the work). A follow up action was assigned to the Plant Engineering Department to determine the effects of the cable in its as found condition.

On December 19, 1995, at 1800, Plant Engineering issued Engineering Operational Problem Response 95-03-14-85 which stated that in the event of a seismic occurrence the unrestrained cable may have damaged safety related relays in the Emergency Core Cooling System, panel 903-33. As such, the relays were considered inoperable.

An Investigation revealed that cable #80076 had been pulled into panel 903-33 as part of Exempt Change P12-3-94-224 on 4-12-94. Exempt Change P12-3-94-224 was issued to perform outage work in preparation for transfer of the (ECCS) Emergency Core Cooling System actuation from the present Yarway level switches to the existing (ATWS), Anticipated Transient Without Scram level transmitters. The Exempt Change was issued for pulling cables only, terminations were to be performed later. The installation was completed 4-12-94 and accepted by Quality Control on 5-13-94. The Exempt Change was closed out by engineering on 7-19-94.

Panels 2203-70A, ATWS Trip Unit Logic; 903-33, Emergency Core Cooling; 903-32, LPCI/Core Spray Auto Blowdown were also part of Exempt Change P12-3-94-244. Plant engineering evaluated these panels for potential problems, none were noted.

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 (MNSB 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)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Dresden Nuclear Power Station, Unit 3	05000249	95	-- 023 --	00	3 OF 4

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

C. CAUSE OF EVENT:

The root cause was personnel error, NRC Cause Code A. Engineering failed to provide criteria in Exempt Change P12-3-94-224, for securing cable #80076 in safety related panel 903-33 to prevent damage in the event of a seismic occurrence. Cable 80076 was to remain unterminated for an extended period of time.

A contributing factor was the short coming of Nuclear Station Work Procedure for cable installation and inspection, NSWP E-01, to address cables pulled into safety related/seismic class IE panels but not terminated before the equipment is returned to operation.

D. SAFETY ANALYSIS:

The affected relays in the 903-33 panel provide for automatic initiation of the Emergency Core Cooling System. Had a seismic event occurred in which the relays were damaged and the Core Spray system was required to mitigate an accident, manual operator actions would have been required to initiate the 'B' system.

E. CORRECTIVE ACTIONS:

Immediate Action: Station Work Request, (WR) 950116009 was written to restrain cable 80076 in panel 903-33. Engineering followed this up with another PIF, NTS 249-180-95-02300, after the (EOPR) Engineering Operational Problem Report was written, an evaluation was completed for the equipment in the Emergency Core Cooling System panel (903-33).

A walkdown was performed on 1/16/96 by Operations, Contract Maintenance, and Design Engineering in the Auxiliary Electric Equipment Room (AEER). Seven control panels per unit were inspected for un-restrained cables. No un-restrained cables were identified. Based upon this survey, it is concluded that the un-restrained cable in Panel 903-33 was an isolated event.

Long Term Actions: Site Engineering will revise DAP 21-03, Dresden Administrative Procedure for "Processing Plant Modifications". The revision will provide guidelines for partial installations of modifications and interactions with existing panels and equipment. Specific instructions will be provided to the installer in Part IV of the Engineering Change Notice, ECN. (NTS 249-180-95-02301)

Contract Maintenance will request Corporate Construction Services to revise NSWP E-01, Electrical Cable Installation and Inspection, to address cables pulled into panels and equipment that will not be terminated prior to the panel/equipment being returned to operation. The Cable Installation Checklist, E-01 Exhibit A will also be revised to add an attribute for cables pulled but not terminated. (NTS 249-180-95-02302)

Training will be conducted for the revision to NSWP E-01 with the following groups: electrical maintenance, site construction, instrument maintenance, work control, quality control, plant engineering and design engineering. (NTS 249-180-95-02303)

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 3	05000249	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 4
		95	-- 023 --	00	

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

F. PREVIOUS OCCURRENCES:

A search was performed for previous related occurrences using the criteria "Safety Related Cabinet", and "Cable Pulling". None were found.

G. COMPONENT FAILURE DATA:

Not Applicable.