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Dresden Generating Station
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July 10, 1996

JSPLTR #96-0104

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

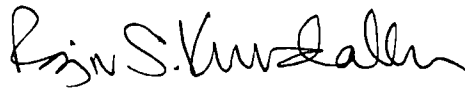
Licensee Event Report 96-010, Docket 50-237 is attached and is being submitted pursuant to 10CFR50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

This correspondence contains the following commitments:

1. The Tritium sample "predefine" will be revised to clearly indicate the analysis must be completed prior to signature for completion. (NTS#2371809601001)
2. The 1995 Annual Radiological Environmental Operating Report and the affected Semiannual Radioactive Effluent Release Reports will be revised and resubmitted. (NTS#2371809601002, 2371809601003).

If you have any questions, please contact Pete Holland, Dresden Regulatory Assurance Supervisor at (815) 942-2920 extension, 2714.

Sincerely,


to J. Stephen Perry
Site Vice President
Dresden Station

Enclosure

cc: H. Miller, Regional Administrator, Region III
NRC Resident Inspector's Office
Illinois Department of Nuclear Safety

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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) 0500237	PAGE (3) 1 OF 9
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TITLE (4)
Tritium Analysis Requirement Exceeded Due to Chemistry Management Personnel Error

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	
06	13	96	96	-- 010 --	00	07	10	96	Dresden Unit 1	0500010	
									Dresden Unit 3	0500249	

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER LEVEL (10) 100	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 M. Thacker, Chemistry Department	TELEPHONE NUMBER (Include Area Code) Ext. 2828 (815) 942-2920
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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 June 13, 1996 it was determined that the Station Technical Specification surveillance requirements for Tritium activity analysis had not been performed correctly since June of 1995. Samples had been performed and stored for final analysis. The analysis was not completed because a Chemistry Department Management Radiochemist failed to complete the analysis requirements of Dresden Chemistry Procedure (DCP) 3220-01, "Tritium". The Radiochemist is no longer employed by the corporation. Corrective actions include enhancement of the administrative sampling control process and update of tritium effluent release reports required by the Offsite Dose Calculation Manual. The safety significance of this event was minimal.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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Dresden Nuclear Power Station, Unit 2	0500237	96	-- 010 --	00	2 OF 9

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

EVENT IDENTIFICATION:

Tritium Analysis Requirement Exceeded Due to Chemistry Management Personnel Error

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 1/2/3 Event Date: 06/13/96 Event Time: 0730
 Reactor Mode: N/N/N
 Mode Name: Decommissioned/Shutdown/Shutdown
 Power Level: N/0%/0%
 Reactor Coolant System Pressure: 0/0/0 psig

B. DESCRIPTION OF EVENT:

This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications. On June 13, 1996 it was determined that the Station Technical Specification surveillance requirements for Tritium activity analysis had not been performed correctly since June of 1995.

Dresden Unit 2 and 3 Technical Specification (TS) 3/4.8.(A)1 requires that radioactive materials released in gaseous effluents from the site shall be determined to be within the prescribed limits by obtaining representative samples in accordance with the sampling and analysis program specified in Table 4.8.1. Unit 2/3 TS Table 4.8.1, "Radioactive Gaseous Waste Sampling and Analysis Program" Section A requires monthly grab samples to determine Tritium concentration from the Unit 2/3 Main chimney and the Unit 2/3 Reactor Building Vent Stack. Dresden Unit 1 Technical Specification 3/4.8(A)2.a requires once per month activity analysis to determine tritium activity from the Unit 1 Main Chimney. There are thus three monthly tritium activity analyses required by the Dresden Station Technical Specifications.

On June 13, 1995, required station tritium samples were obtained and the station effluent activity was analyzed as required in Dresden Chemistry Procedure (DCP) 3220-01, "Tritium". The samples were counted using a Packard Tri-Carb Model 4530 Liquid Scintillation Counter (LSC). Sample data and calculations were recorded on DCP 3220-01 Data Sheet 2, "Tritium Sampling and Calculations for Refrigerated Vapor Trap Collection". Sample results were then included in the station effluent report. Results are as shown in Table 1.

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On July 23, 1995, the required station tritium samples were taken as shown in Table 1. The samples were not correctly analyzed. Samples were counted and data was recorded on the first part of DCP 3220-01 Data Sheet 2. The Radiochemist performed the counting of the sample but failed to complete the data sheet. No counting information was entered into the data sheet and no final activities were determined. DCP 3220-01 does not indicate any required time for completing the analysis. The management Radiochemist A was unavailable for interviews to determine why the final calculations were not performed because he is no longer employed by the corporation. It is believed that he delayed the final calculation steps because of the need for chimney flow data input for the three release points. This flow data was to be provided by the Radiological Protection Health Physicist which is responsible for Offsite Dose Calculation Manual (ODCM) reporting requirements. The samples were stored in the chemistry lab awaiting the finishing of the tritium calculation.

The August 1995 to November 1995 samples were handled in the same manner as the July 1995 samples.

During November 1995 the Management Radiochemist A responsible for failing to complete the July to November sample analyses turned over his duties to a new Chemistry Department Management person.

During November 1995 Chemistry Management determined that the Model 4530 LSC used to count tritium samples was inoperable and a new LSC would have to be obtained.

The October 1995 to May 1996 tritium samples were taken and stored for final analysis.

On June 13, 1996 it was determined that the Station failed to meet the TS requirement for Tritium activity analysis. A Station Problem Identification Form was initiated to document the situation.

On June 20 and 21, 1996 the November 1995 and March 1996 samples awaiting analysis were analyzed. Because required documents relating to the samples could not be found, the final activity had to be estimated due to missing sample time off, flow rate off and weight of sample collected. Table 1 provides summary analytical results for the tritium samples from June 1995 to May 1996.

A review of the methods which are intended to ensure compliance with Tritium TS sampling requirements was performed. The station uses a management control system known as "Pre Defines" which is intended to provide a comprehensive scheduling method for surveillance requirements needed to ensure TS compliance. The Tritium sample predefined tasks were unclear and inconsistent.

A review of DCP 2213-01 "Main Chimney" and DCP 2218-01 "Reactor Building Vent" was performed. The procedures provide guidance for performing the tritium sampling function and analysis frequency.

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It was determined that the Model 4530 LSC was not repairable and a new Packard Model 2550 Liquid Scintillation Counter was obtained. DCP 4212-01, "Liquid Scintillation Counter", revision 2, was approved on June 18, 1996 and instituted guidance for operation of the new LSC.

The Chemistry Department uses Departmental assignment sheets to determine daily sampling assignments for the Chemistry Technicians. Since the final tritium calculations were performed by management this system did not check that the samples were analyzed to completion.

The station is required by the Station ODCM to submit periodic radioactive release reports. These include an "Annual Radiological Environmental Operating Report" and the "Radioactive Effluent Release Report". The July-December Radioactive Effluent Release Report required the inclusion of the tritium sample results. Because the results were not available to the personnel preparing the reports the tritium data was reported as estimated values in the Radioactive Effluent Report for the July to December 1995 Report. The effluent report indicated that the tritium values for the third and fourth quarter 1995 were estimates based on values from the first and second quarter 1995. The Annual Environmental Report for 1995 also included estimated values for tritium gaseous effluents to the atmosphere. No reason for the tritium estimates were included in either the effluent report or the Annual Environmental Report. There are no ODCM requirements for stating the reason why the values were estimates. The deletion of the reasons for the estimates is considered a poor records management practice by the Radiation Protection Manager. Concise explanations for the reason why the tritium samples were estimated should have been included in the reports.

C. CAUSE OF EVENT:

The cause of this event was a Personnel Error, NRC Cause Code A, because the Management Radiochemist A failed to properly complete the requirements of the tritium sampling procedure.

A contributing cause was that Management failed to take action for a known problem. The LSC used to count tritium samples was inoperable from November 1995 until it was replaced in June 1996. Chemistry Department administrative controls associated with the procedure and surveillance program to ensure Technical Specification compliance in the Chemistry area were less than adequate.

Specifically:

1. The Pre-Define method used by Chemistry Supervision to control sample and analysis was unclear. The tritium sample task scope was not clearly defined as it did not indicate what portion of the task actually satisfied the Technical Specification requirement.

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2. The instrument which was used to analyze tritium samples was inoperable from November 1995 and there was inadequate efforts to get it repaired. Management allowed this long standing equipment problem to remain unresolved.
3. Task assignment sheets used by Management known as "Technical Routines" to track completion of tritium sampling did not check that the samples were analyzed to completion.

A second contributing cause was a communication breakdown between the Chemistry and Health Physics group. The HP who prepared the periodic effluent reports failed to challenge the untimeliness of tritium results from the chemistry department. The Chemistry Department failed to aggressively pursue the information required of the RP department to complete the tritium analysis.

A final contributing cause was the breakdown in checks and balances. Radiochemist A took over the tritium program after the sample was drawn (including the counting and analysis of the sample) thus negating his supervisory oversight function for the technicians. In effect, this allowed Radiochemist A to become a single point of failure when poor judgement was made regarding tritium sample analysis.

D. SAFETY ANALYSIS:

In order to calculate the offsite dose to the public from airborne effluents released into the airborne environment from the three main release pathways (U2/3 Main Chimney, U2/3 Reactor Vent and the U1 Main Chimney), the total activity on a per unit basis for each release pathway is calculated. The activity is then put into a computer code to calculate the offsite dose for infants, children, teenagers and adults. The calculated doses are compared to the limits in 10 CFR 50 Appendix I and 10 CFR 20.1301.

For all of 1995, the maximum offsite dose which was calculated for units 1, 2 & 3 were 0%, 0.07% and 0.18% of the Appendix I limits, respectively. The contribution to offsite dose due to Tritium (H-3) would only be a fraction of that total calculated dose since H-3 was only one of the many radionuclides released.

Use of estimated data for the second half of 1995 which was based on the first six months on 1995, did not pose a risk to the health and safety of the public since all of the doses due to airborne releases were well below the applicable limits. Since H-3 was the only estimated radionuclide, and the other radionuclides were based on actual data, in order to have a problem with offsite dose, the H-3 activity released would have need to have been increased several orders of magnitude which is inconsistent with previous years results.

Therefore, the safety significance of this event was minimal.

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E. CORRECTIVE ACTIONS:

The procedure for the new Packard Model 2550 Liquid Scintillation Counter was authorized and tritium analyses for the unanalyzed samples were completed.

An indepth audit of all Chemistry related technical specifications was completed. As part of this audit, chemistry procedures implementing the technical specifications were verified. In addition, the previous three months of sample data meeting the technical specifications were also verified.

The Tritium sample "predefine" will be revised to clearly indicate the analysis must be completed prior to signature for completion. (NTS#2371809601001) In addition, the actual analysis of the tritium sample has been added to the chemistry technician assignment sheets to provide additional verification of completion.

The 1995 Annual Radiological Environmental Operating Report and the affected Semiannual Radioactive Effluent Release Reports will be revised and resubmitted. (NTS#2371809601002, 2371809601003).

The need for increased communication and attention to timeliness of required interactions between the RP and Chemistry Departments has been addressed by the Radiation Protection Manager. The RP Manager has determined his expectations and communicated them to personnel responsible for the reports.

F. PREVIOUS OCCURRENCES:

LER/Docket Number Title

94-02/05000010 Technical Specification Required Sample Performed at an Incorrect Frequency Due to Inadequate Administrative Controls

During a review of the approved Amendment 37 to Unit 1 Technical Specifications and supporting procedures, it was determined that a surveillance was performed at an incorrect frequency. Amendment 37, dated September 3, 1993, requires grab samples of the exhaust to the Unit 1 Chimney be taken and analyzed daily whenever the Unit 1 Chimney Effluent Radiation Monitor is out of service. Contrary to this, samples were taken weekly during the periods the Effluent Radiation Monitor was out of service. The root cause of this event was a management deficiency in that a matrix organization was in place with no clearly defined roles and responsibilities. All individuals in the matrix organization had other conflicting responsibilities. No single person accepted personal responsibility for implementing the revised Unit 1 Technical Specifications. On January 1, 1994 administrative controls were corrected to sample daily when the Effluent Radiation Monitor was not in service.

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96-08/0500237 Non-Routine Sample Time Requirement Exceeded Due to Chemistry Technician Personnel Error

Service Water Radiation monitor sample requirements of Technical Specification (TS) Table 3.2.4, Action A, which requires twelve hour grab samples of the Service Water Effluent Gross Activity Monitor were not met. A Chemistry Technician failed to obtain the sample within the time requirements of the TS requirements. Valid samples were taken approximately 14 hours after the SW radiation monitor was last sampled successfully. The twelve hour sample criteria was thus exceeded by two hours due to a personnel error by the Chemistry Technician. Corrective actions included disciplinary action to the technician.

96-003/0500237 Non-Routine Sample Time Requirement Exceeded Due to Chemistry Technician Personnel Error

During planned corrective maintenance on the Unit 3 Service Water (SW) Radiation monitor the requirements of Technical Specification (TS) Table 3.2.4, Action A, which requires twelve hour grab samples of the Service Water Effluent Gross Activity Monitor was not met. A Chemistry Technician obtained the initial sample to meet the TS requirements from the water volume isolated from the station service water by the valve isolation boundary established for the maintenance activity. The initial sample taken to satisfy the requirement was thus not representative of the service water discharge to the environs and was invalid. Valid samples were taken fifteen hours after the SW radiation monitor was isolated. The twelve hour sample criteria was thus exceeded by three hours due to a personnel error by the Chemistry Technician. Corrective actions included disciplinary action to the technician. No radioactive releases to the environs occurred and thus the safety significance is minimal.

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95-013/0500237 Inadequate Sampling of Service Water Effluent Due to Use of a Superseded Procedure and Recent System Configuration Change

On July 5, 1995, at 0630 hours, a System Engineer (SE) performed a walkdown of the Service Water (SW) Effluent Radiation Monitor sample system and discovered that two normally open system valves had been throttled. This reduced pressure to SW sample eductor, resulting in inadequate sampling of the SW effluent. The SE reported this to the Work Execution Center (WEC). An Equipment Attendant (EA) was dispatched to restore sample flow. This event occurred due to an EA using a superseded procedure to backflush the system sample line. The EA's inappropriate actions were reinforced through recent training that the EA had received on the superseded SW Effluent Radiation Monitor sample system procedure. The corrective actions are: (1) to provide up to date training for all station personnel, (2) to correct station procedure distribution and (3) enhanced communication methods for all personnel in training.

92-018/05000237 Sample not analyzed within required time period due to personnel error

Dresden Unit 3 Service Water had not been analyzed for beta/gamma activity for a nineteen hour and thirty-nine minute period. Because the Unit 3 Service Water Monitor was inoperable, a service water sample was collected at 2000 hours on July 23, 1992 and the analysis was not performed in a timely manner. Corrective actions included disciplinary action for the Chemistry Technician. Procedures DCS 6240-01, DCS 6280-01 and DCS 6290-01 were revised to perform gamma isotopic analysis on service water samples whenever the appropriate unit's service water gross activity monitor is inoperable. DAP 16-05 was revised to record time and date the last service water sample was collected and the time and date the last service water sample was analyzed for each unit. These procedural enhancements were in place at the time of the subject LER and would not be expected to preclude the Chemistry Technician A's personnel error in performing the sampling procedures of LER 2-96-008.

G. COMPONENT FAILURE DATA:

There were no component failures associated with this event.

LICENSEE EVENT REPORT (LER)
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Table 1

Sample Name	Sample Date	Sample Time	Date Counted	Activity Results	Monthly Ci
Unit 1 Main Chimney	6/25/95	0755	7/19/95	9.13E-5	1.89E-2
Unit 2/3 Main Chimney	6/25/95	0815	7/19/95	1.36E-5	2.49E-2
Unit 2/3 Reactor Building Vent Stack	6/25/95	0810	7/19/95	1.11E-4	8.72E-2
Unit 1 Main Chimney	7/23/95	1612	6/20/96	1.37E-4	3.40E-2
Unit 2/3 Main Chimney	7/23/95	1600	6/20/96	1.66E-4	2.42E-1
Unit 2/3 Reactor Building Vent Stack	7/23/95	1555	6/20/96	1.18E-5	7.92E-3
Unit 1 Main Chimney	8/17/95	2112	6/20/96	8.22E-5	5.51E-2
Unit 2/3 Main Chimney	8/17/95	2112	6/20/96	1.93E-6	5.09E-3
Unit 2/3 Reactor Building Vent Stack	8/17/95	2132	6/20/96	8.07E-5	8.07E-5
Unit 1 Main Chimney	9/14/95	1150	6/20/96	1.23E-4	4.49E-2
Unit 2/3 Main Chimney	9/14/95	1120	6/20/96	3.48E-5	4.47E-2
Unit 2/3 Reactor Building Vent Stack	9/14/95	1100	6/20/96	7.67E-5	5.04E-2
Unit 1 Main Chimney	10/13/95	1610	6/20/96	1.34E-4	5.32E-2
Unit 2/3 Main Chimney	10/13/95	1830	6/20/96	4.53E-5	8.16E-2
Unit 2/3 Reactor Building Vent Stack	10/13/95	1640	6/20/96	1.11E-4	1.06E-1
Unit 1 Main Chimney	11/13/95	*	6/20/96**	2.18E-4	3.62E-2
Unit 2/3 Main Chimney	11/13/95	*	6/20/96**	9.18E-5	8.33E-2
Unit 2/3 Reactor Building Vent Stack	11/13/95	*	6/20/96**	1.79E-4	9.66E-2
Unit 1 Main Chimney	12/15/95	1930	6/20/96	3.00E-4	4.16E-2
Unit 2/3 Main Chimney	12/15/95	1952	6/20/96	1.61E-4	1.68E-1
Unit 2/3 Reactor Building Vent Stack	12/15/95	1945	6/20/96	2.09E-4	1.09E-1
Unit 1 Main Chimney	1/19/96	1050	6/20/96	1.12E-4	2.23E-2
Unit 2/3 Main Chimney	1/19/96	0830	6/20/96	1.28E-4	1.64E-1
Unit 2/3 Reactor Building Vent Stack	1/19/96	0900	6/20/96	1.52E-4	1.66E-1
Unit 1 Main Chimney	2/9/96	1130	6/20/96	1.35E-4	1.57E-2
Unit 2/3 Main Chimney	2/9/96	1340	6/20/96	1.82E-4	1.07E-1
Unit 2/3 Reactor Building Vent Stack	2/9/96	1414	6/20/96	3.46E-4	1.88E-1
Unit 1 Main Chimney	3/7/96	1040	6/20/96	2.71E-4	3.07E-2
Unit 2/3 Main Chimney	3/8/96	*	6/20/96**	2.97E-4	2.56E-1
Unit 2/3 Reactor Building Vent Stack	3/8/96	*	6/20/96**	2.51E-4	1.56E-1
Unit 1 Main Chimney	4/5/96	0837	6/21/96	1.44E-4	2.45E-2
Unit 2/3 Main Chimney	4/5/96	0920	6/21/96	2.55E-4	2.60E-1
Unit 2/3 Reactor Building Vent Stack	4/5/96	0825	6/21/96	1.82E-4	1.82E-4
Unit 1 Main Chimney	5/3/96	0830	6/21/96	1.76E-4	3.21E-2
Unit 2/3 Main Chimney	5/3/96	0845	6/21/96	3.23E-4	2.59E-1
Unit 2/3 Reactor Building Vent Stack	5/3/96	1105	6/21/96	2.10E-4	7.99E-2
Unit 1 Main Chimney	5/31/96	1757	6/21/96	7.99E-5	1.29E-2
Unit 2/3 Main Chimney	5/31/96	2000	6/21/96	4.07E-5	4.64E-2
Unit 2/3 Reactor Building Vent Stack	5/31/96	1940	6/21/96	2.09E-4	1.10E-1

Notes: * Effluent Tritium release values are estimated because portions of sample flow data were unobtainable.
** Calculation estimate performed on this date.