

November 14, 1996

EA 96-388  
EA 96-389  
EA 96-390

Mr. H. W. Keiser  
Chief, Nuclear Operating Officer  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 300  
Downers Grove, IL 60515

SUBJECT: NRC INSPECTION REPORT NOS. 50-237/96012(DRS);50-249/96012(DRS);  
50-254/96016(DRS);AND 50-265/96016(DRS)AND NOTICE OF  
VIOLATION

Dear Mr. Keiser:

This refers to the inspection conducted on July 8 through October 17, 1996, at the Dresden and Quad Cities nuclear facilities. The purpose of the inspection was to determine whether activities authorized by the licenses were conducted safely and in accordance with NRC requirements. The inspection scope included a review of Appendix R hot short concerns (Dresden and Quad Cities); 4KV breaker hardened grease concerns (Dresden only); and previously identified electrical distribution system functional inspection (EDSFI) items (Dresden only). At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, one apparent violation was identified and is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. Accordingly, no Notice of Violation is presently being issued for this inspection finding. The apparent violation involved the failure to provide adequate protection to ensure that motor-operated valves necessary to achieve and maintain hot shutdown conditions were not susceptible to fire induced hot shorts. Spurious valve operation with mechanical damage to certain 10 CFR 50, Appendix R, designated valves could result in the loss of safe shutdown capability during a control room fire (Section E1.1.b(1)). The circumstances surrounding the apparent violation, the significance of the issue, and corrective actions were discussed with members of your staff at the exit meeting on October 17, 1996. As a result, it may not be necessary to conduct a predecisional enforcement conference in

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order to enable the NRC to make an enforcement decision. However, a Notice of Violation is not presently being issued for the inspection finding. Before the NRC makes its enforcement decision, we are providing you an opportunity to either: (1) respond to the apparent violation addressed in this inspection report within 30 days of the date of this letter; or (2) request a predecisional enforcement conference. Please contact Mr. Ronald Gardner at (630) 829-9751 within 7 days of the date of this letter to notify the NRC of your intended response.

In addition, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation concerns the use of an inadequate breaker maintenance procedure to maintain safety related 4KV breakers. This procedure directed an inappropriate sequence of lubrication steps, including the use of an incompatible degreaser. In addition, Dresden failed to control the use of incompatible chemicals, such as penetrating oils, that were used during breaker troubleshooting and maintenance. Also, a more rigorous review of 4KV Magne-Blast circuit breaker service advisory letters (SALs) may have led to identification of the hardened grease issue before the 3A low pressure coolant injection (LPCI) pump motor breaker failure on June 11, 1996 (Section E1.1.b(2)).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence are already adequately addressed on the docket in Commonwealth Edison Company letter JSPLTR #96-0148, dated August 29, 1996, and this inspection report. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

Your response to the apparent violation should be clearly marked as a "Response to An Apparent Violation in Inspection Report Nos. 50-237/96012(DRS);50-249/96012(DRS); 50-254/96016(DRS);50-265/96016(DRS)," and should include: (1) the reason for the apparent violation, or, if contested, the basis for disputing the apparent violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Include in your response details describing management's decision process regarding the priorities and resource allocations that delayed correction of the hot short issue prior to 1996. You should include a discussion of assurances that similar nonconforming conditions do not exist at any of your other nuclear power plants and that site and/or corporate engineers are providing conservative recommendations to station management when addressing nonconforming conditions. In addition, Dresden did not consider the susceptibility of the Units 2 and 3 isolation condenser 1301-3 valve to IN 92-18 hot shorts to be a credible event. Include in your response the rationale behind Dresden's decision to not report this condition as outside the safe shutdown design basis of the plant (10 CFR 50.73(a)(2)(ii)(B)).

Your response should be submitted under oath or affirmation and may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a predecisional enforcement conference.

In addition, please be advised that the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

Two unresolved items were identified involving old EDSFI items. The first item involves the cable ampacity issue that was identified in 1991. About 350 cables require additional analyses. Even though Dresden was to complete their evaluation by the end of 1996, we consider your actions to be slow in resolving this issue. The second item involves the lack of 125 and 250Vdc breaker to breaker coordination for several nonsafety loads connected to the safety buses. If a nonsafety load faulted, the potential exists to lose the safety bus. This item is being referred to the Office of Nuclear Reactor Regulation (NRR) for further review.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (if you choose to provide one) will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Sincerely,

Original signed by Brent Clayton for

Geoffrey E. Grant, Director  
Division of Reactor Safety

Docket Nos. 50-237; 50-249  
Docket Nos. 50-254; 50-265

- Enclosures:
1. Notice of Violation
  2. Inspection Report Nos.  
 50-237/96012(DRS);  
 50-249/96012(DRS);  
 50-254/96016(DRS);  
 50-265/96016(DRS)

See Attached Distribution

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DATE	10/30/96		10/30/96		10/16/96		10/17/96		10/14/96	

OFFICIAL RECORD COPY

cc w/encls: J. S. Perry, Site Vice President  
E. Kraft, Site Vice President  
D. A. Sager, Vice President,  
Generation Support  
T. Nauman, Station Manager, Unit 1  
M. Heffley, Station Manager, Units 2 and 3  
L. W. Pearce, Station Manager  
F. Spangenberg, Regulatory Assurance  
Supervisor  
N. Chrissotimos, Regulatory Assurance  
Supervisor  
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Regulatory Services Manager  
Document Control Desk - Licensing  
Richard Hubbard  
Nathan Schloss, Economist,  
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Chairman, Illinois Commerce Commission  
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Transmission, MidAmerican Energy Company

Distribution:

Docket File w/encl	SRI's, Dresden, LaSalle,	Enf. Coordinator, RIII w/encl
PUBLIC IE-01 w/encl	Quad Cities w/encl	RAC1 w/encl (E-mail)
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J. Lieberman, OE	J. Goldberg, OGC	R. Zimmerman, NRR

NOTICE OF VIOLATION

Commonwealth Edison Company  
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249  
License No. DPR-19; DPR-25

During an NRC inspection conducted on July 8 through October 17, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion V, requires in part, that activities affecting quality be prescribed by documented procedures of a type appropriate for the circumstances and include appropriate qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, Maintenance Procedure DES 6700-03, Revision 7, dated April 18, 1996, "Inspection and Maintenance of General Electric 4KV Magne-Blast Circuit Breakers Types AM-4.76-250-OD (Horizontal Drawout)," an activity affecting quality, was not appropriate for the circumstances in that it directed an inappropriate sequence of lubrication steps including the use of an incompatible degreaser. In addition, the licensee failed to control the use of incompatible chemicals, such as penetrating oils, that were used during breaker troubleshooting and maintenance. This resulted in hardened grease preventing the 3A Low Pressure Coolant Injection (LPCI) pump breaker from tripping open for ten seconds on June 11, 1996.

This is a Severity Level IV violation (Supplement I).

With regard to this violation, the NRC has concluded that the information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved is already adequately addressed in the enclosed inspection report (Nos. 50-237/96012(DRS); 50-249/96012(DRS)). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Dated at Lisle, Illinois  
this 14th day of November 1996

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