

Public

November 21, 1996

CAL No. RIII-96-016

Mr. J. S. Perry
Site Vice President
Dresden Station
Commonwealth Edison Company
6500 North Dresden Road
Morris, IL 60450

SUBJECT: CONFIRMATORY ACTION LETTER

REFERENCES: (1) NRC letter, Samuel J. Collins to Thomas J. Maiman, dated August 9, 1996.
(2) ComEd letter, J. S. Perry to A. Bill Beach, dated November 8, 1996.

Dear Mr. Perry:

Based on the cyclic performance of the Dresden Nuclear Power Station for the last 4 years, the NRC is completing an Independent Safety Inspection (ISI) to provide an evaluation of safety performance. The overall goals and objectives of the ISI were outlined in Reference 1. Between September 30 and November 8, 1996, the ISI conducted its on-site inspections at the Dresden Station.

The preliminary results of the ISI evaluation identified significant concerns with the station's control of calculations and with the overall performance of site and corporate engineering activities. These concerns were identified to you and your staff through daily discussions during the on-site inspection activities.

In response to the ISI concerns, your staff performed a series of reviews and concluded that current plant conditions were safe and supported continued operation. The results of your assessment and actions planned to provide further confidence in the adequacy of the design basis and engineering activities were summarized in Reference 2.

Pursuant to your letter (Reference 2) and based on subsequent telephone conversations on November 15 and 18 between you and Mr. Patrick L. Hiland, Branch Chief, Division of Reactor Projects, Region III, it is our understanding that you have taken or will take the following actions:

- (1) An Engineering Assurance Group (EAG) consisting of senior Commonwealth Edison (ComEd) engineering personnel and experienced outside experts was established and in place on November 18. The EAG will function to provide oversight of key engineering activities until normal engineering functions have improved to the point where these reviews are no longer necessary.

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- (2) The Nuclear Engineering Procedures will be revised to provide specific direction on action to be taken whenever a potential design basis discrepancy is identified. The revisions and associated training are planned to be completed by January 31, 1997.
- (3) The Nuclear Engineering Procedure on control of calculations will be revised to provide clearer guidance, expectations, and directions on the review, control, and reconstitution/verification of calculations for equipment or portions of systems affected by new modifications. The revisions and associated training are planned to be completed by December 2, 1996.
- (4) An immediate screening of key parameters will be performed on the 12 systems most important from a risk perspective. The screening will include a review of key operating parameters against existing system calculations to verify that calculations support those parameters. The screening will be performed by a dedicated team of senior experienced engineering personnel from outside of ComEd. The screenings are planned to be completed by February 28, 1997.
- (5) On an ongoing basis, reconstitution or validation of the design basis and/or calculations will be performed on equipment and portions of the 12 systems most important from a risk perspective which are affected by design modifications.
- (6) Audits of the Nuclear Steam Supply System (NSSS) supplier and selected Architect Engineers (AEs) will be performed by Site Quality Assurance and ComEd Chief Engineers to determine quality of design control and calculation quality. The initial audit of Sargent and Lundy was started in November 1996.

In order to assure that the direction for the above activities remains focused, the NRC will periodically review your results. In the short term, the NRC expects the following:

- A document detailing the membership and background of EAG members, charter of the EAG, responsibility, and EAG implementing procedures will be provided to the NRC by December 6, 1996.
- The results and actions in response to these on-going EAG activities will be provided directly to the NRC on a monthly basis through a meeting and docketed correspondence until such time that we have fully assessed the effectiveness of oversight activities.
- The results of the screening performed on the 12 systems selected from a risk perspective will be provided to the NRC on a monthly basis through a meeting and docketed correspondence.
- The NRC will be immediately informed if critical parameters on any of the 12 systems selected for screening are discovered to be outside of normal acceptance values.

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- The schedule, results, and proposed actions relative to your NSSS and AE audits will be provided to the NRC until such time that we have fully assessed the effectiveness of the audits. The results will be provided on a monthly basis through a meeting and docketed correspondence.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

- 1) Notify me immediately if your understanding differs from that set forth above;
- 2) Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change; and
- 3) Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on your part; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response 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. However, if you find it necessary to provide such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Sincerely,

A. Bill Beach
Regional Administrator

Docket Nos. 50-237; 50-249

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- 3) Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

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Sincerely,

A. Bill Beach
Regional Administrator

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cc w/encl: D. A. Sager, Vice President,
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M. Heffley, Station Manager Units 2 and 3
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