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

Subject: Update of Dresden Station's Instrument Out of Tolerance Program.  
NRC Docket Numbers 50-237 and 50-249

- References:
- (a) D. Farrar letter to Director, Office of Enforcement, dated June 16, 1994, transmitting Commonwealth Edison Company's response to Notice of Violation regarding inadequate corrective actions associated with reactor water level instrumentation.
  - (b) T. P. Joyce letter to US Nuclear Regulatory Commission, dated June 21, 1995, transmitting Commonwealth Edison Company's response to the request for an update of corrective actions associated with violation 50-237/249-94002-04.

Reference (a) documents Commonwealth Edison Company's response to Notice of Violation regarding inadequate corrective actions associated with reactor water level instrumentation performance. These corrective actions included:

- Development and implementation of the Integrated Reporting Process (IRP) database for trending equipment performance.
- Initiating a Performance Improvement Form (PIF) for each instrument out of tolerance for entry into the IRP database.
- Revise Technical Specification Setpoints.
- Develop guidance for a station performance trending program.
- Periodically review and revise as required technical issues based on performance trends.

Reference (b) documented Commonwealth Edison Company's acknowledgment of the inadequacy of the corrective actions identified in reference (a) to ensure system engineers review and trend instrument out of tolerance data. It further identified several new corrective actions to replace the previously committed actions. These new actions included:

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- Revision of System Engineering Memo 25 to incorporate specific expectations for instrument performance monitoring.
- Enhancing the IRP database to ensure more consistent data recorded on PIFs for instrument out of tolerances.
- Counseling of the individual system engineers and system engineering supervisors to ensure expectations regarding instrument trending were understood.
- Periodic surveillances by Dresden Station's Site Quality Verification Group (SQV) of the instrument out of tolerance trending program to ensure expectations regarding instrument out of tolerance trending.

The purpose of this letter is to document the current Instrument Out of Tolerance Program at Dresden Station and to provide an update to docketed responses to Inspection Reports 50-237/249/94002-04 and 50-010/237/249/95005.

Dresden Station recognizes that periodic testing of plant instrumentation is essential to ensure proper operation and protection of plant and station systems. The program outlined in reference (b) involved initiation of a PIF each time an instrument is found out of the specified tolerance listed in the calibration/functional test procedure and periodic review of the IRP database by the individual system engineer to trend instrument out of tolerance issues. Although the current instrument monitoring program has been effective in identifying trends in instrument performance, the program relies on generation of a PIF each time an instrument exceeds a pre-determined, specified tolerance. A review of the PIF data for instrument out of tolerances since 1994 by Plant Engineering has indicated that improvements can be realized in the following areas:

- In most cases, the specified tolerance is the 'setting tolerance' which is the criteria established to determine the maximum bounds the instrument must be within after calibration to assure that it will perform its function within allowable limits. This tolerance does not include any consideration for instrument drift or, in most cases, reference accuracy or repeatability. Therefore, if the instrument is found to be outside of these limits, it does not necessarily indicate a performance problem with the instrument.
- Inconsistent and incomplete information concerning instrument numbers and the as-found/as-left calibration information is provided on the PIFs.
- Inconsistent approach taken to trending by individual system engineers resulting in not identifying adverse trends based on component characteristics (type, manufacturer, model, etc.).
- Large backlog of unresolved instrument out of tolerance PIFs (approximately 2500) which are not necessarily problems make it difficult to identify potential 'true' adverse trends.

Improvements which are being made to our instrument trending program are as follows:

- Issue a Dresden Station approved Instrument Performance Monitoring Program Document consistent with industry standards. Expected completion date is April 30, 1997.
- Complete a system based review of the instrument out of tolerances prioritized consistent with the IPE model. Expected completion date January 7, 1998.
- Identify adverse trends based on the review and implement appropriate corrective actions. Expected completion date January 31, 1998.
- Implement a computer based automated calibration/instrument trending program to provide current trend information to Plant Engineering. Expected completion date December 31, 1997.
- Perform an effectiveness review of the instrument out of tolerance program following implementation. Expected completion date June 1998.

Until this program is implemented, all instrument out of tolerance PIFs will continue to be reviewed by an instrumentation engineer to assure adverse trends are quickly identified. Implementation of this program will be monitored and tracked by SQV.

These changes are expected to result in continued improvement in our ability to monitor instrument performance within current industry standards.

If you have any questions concerning this issue please contact Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920 ext. 3800.

Respectfully,

  
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Dresden Site-Vice President

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