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March 6, 1997

JSPLTR: 97-0046

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

Subject: Dresden Nuclear Power Station Units 2 and 3 Reply to a Notice of Violation, Inspection Report 50-010; 237; 249/97003 NRC Docket Numbers 50-010, 50-237, and 50-249

Reference:

9703110163

G. E. Grant letter to J. S. Perry, dated February 6, 1997, transmitting NRC Inspection Report 50-010, 237, 249/97003 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to a Notice of Violation transmitted in the above referenced letter. Specifically, the violation at issue involved the undocumented installation of a pump in the Unit 2 torus basement.

An investigation of this incident determined that the torus drain down pump was installed during the mid 1980s as a temporary pump to assist in outage activities. Further research failed to identify any documents that would show the installation was made in accordance with the modification or design change process.

Dresden Station has taken considerable actions to improve its control of the design change process since the period when this installation took place. Extensive procedural instruction and training has been conducted to ensure the Engineering and plant staff clearly understand when installation of equipment requires design change documentation. Additionally, upon discovery of the non-conforming condition, Engineering personnel initiated prompt corrective action that will restore the facility to its authorized design configuration.

Accordingly, this letter contains the following new commitment:

The removal of the torus drain down pump has been added to the work control scope and will be removed by July, 1997. (NTS # 2371009700301a)

The attachment to this letter provides Dresden's reply to the Notice of Violation along with corrective actions to preclude recurrence.

USNRC March 6, 1997

If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, extension 3800.

Sincerely,

NQ.

L Stephen Perry Site Vice President Dresden Station

Attachment



A. Bill Beach, Regional Administrator, Region III
P. L. Hiland, Branch Chief, Division of Reactor Projects, Region III
J. F. Stang, Project Manager, NRR (Unit 2/3)
Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety - IDNS
File: Numerical

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-237/97003, 50-249/97003

VIOLATION:

During an NRC inspection conducted on January 14 through 15 and January 23, 1997, 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 50.59(a) states, in part, that a holder of a license may make changes in the facility as described in the safety analysis report, without prior Commission approval, unless the proposed change involves an unreviewed safety question.

10 CFR 50.59(b)(1) states, in part, that the licensee shall maintain records of changes in the facility made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, as of January 15, 1997, records for a safety-related change to the suppression chamber, involving the installation (in 1984) of a drain down pump, did not include a written safety evaluation to provide the basis for the determination that the installation of the drain pump did not involve an unreviewed safety question. The installation of the drain pump resulted in a suppression chamber configuration that was different than the configuration specified in Section 6.2, "Containment System," of the Dresden Updated Safety Analysis Report for the suppression chamber.

REASON FOR VIOLATION:

Investigation of this incident indicates that the torus drain down pump was installed during the mid 1980s as a temporary pump to assist in outage activities. Further research failed to identify any documents that would show the installation was made in accordance with Dresden's modification or design change process. Therefore, plant drawings, design basis, and Updated Final Safety Analysis Report were not changed to reflect the installed pump.



This incident is attributed to a Management deficiency in that Management did not assure this change conformed with then existing procedures and programs.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Immediately upon discovery of this non-conformance, a Problem Identification Form was written which initiated an Operability Determination for the pump, as installed. The area of the pump was inspected by Plant Engineering and Design Engineering personnel. It was found that the pump was not attached to any plant systems by mechanical means (hoses or piping) and that the pump motor was not connected to an electrical source. Additionally, the pump was secured to the floor with anchor bolts. Engineering determined that the pump did not have any interaction with plant systems and that the skid was firmly mounted to the plant structure.

The Operability Determination (97-33) assessed the operability of the torus and containment structure with the pump installed. After reviewing Plant Engineering's assessment, Operations Department determined there were no operability concerns. This conclusion was based on a seismic assessment that determined the anchorage for the pump was adequate to assure the pump skid would not damage plant equipment should a seismic event occur. A follow-up corrective action was created as a result of this review that required the removal of the pump skid to restore the plant to conform with its approved design.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

Dresden Station has taken considerable actions to improve its control of the design change process since the mid 1980s. Strong procedural instruction and training have been conducted to ensure the Engineering and plant staff are cognizant of when installed equipment requires design change documentation. This is reflected in procedures Dresden Administrative Procedure (DAP) 15-01, "Initiating and Processing a Work Request," and DAP 15-06, "Preparation, Approval, and Control of Work Packages and Work Requests." The Temporary Alteration program, proceduralized by DAP 05-08, "Control of Temporary System Alterations," has been communicated to all plant personnel such that equipment like the torus drain down pump would not be put in place without the proper authorization.

Furthermore, considerable improvements have been made over the last year in the awareness to maintain the plant design basis in accordance with the UFSAR. This is demonstrated in the aggressive Operability Determination program, governed by DAP 07-31, "Operability Determination," that was upgraded during 1996. Dresden continues to search for instances where the plant may not match the design basis and take appropriate corrective action when discrepancies are discovered.



DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The removal of the torus drain down pump has been added to the work control scope and will be removed by July 1997.