PUBLIC

JE-01

June 13, 1997

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

SUBJECT: NRC MAINTENANCE TEAM INSPECTION REPORT 50-237;249/97007 AND NOTICE OF VIOLATION

REFERENCE: NRC LETTER R. J. CANIANO TO T. J. MAIMAN DATED APRIL 5, 1997

Dear Mr. Perry:

This refers to the inspection conducted on April 14 through May 12, 1997, at the Dresden Nuclear facility. At the conclusion of the Dresden Independent Safety Inspection (ISI) conducted last fall, the NRC determined that a followup maintenance team inspection would be required. In order to develop a complete assessment of your maintenance effectiveness, the followup team inspection was conducted during the recent Unit 3 refueling outage. The overall goals and objectives of our inspection activities were outlined in the referenced correspondence.

In general, we found most work tasks observed to be performed well, and our overall conclusion was that maintenance at Dresden was at an acceptable level to support safe plant operations. As noted in the enclosed report there were some areas that require continued management attention to achieve your goal of lasting performance improvements. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Six violations of NRC requirements were identified during the team inspection. Four of the six violations have a common theme involving plant workers' failure to follow approved procedures. These violations are of concern because some procedural adherence problems were found in essentially all maintenance disciplines. The remaining two violations relate to performance of a station battery surveillance test. The first violation regarding the station battery test is of concern to the NRC because of the station's historical problems in battery engineering design control, and the past problems with the conduct of routine battery surveillances. The second violation, regarding the station battery test, is of significant concern because the method, used by the engineering support organization and the test director to revise test requirements, bypassed all station procedural controls. This action indicates a fundamental failure to understand the importance of procedural controls.

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The violations are cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room (PDR).

Sincerely,

Original signed by A. Bill Beach Regional Administrator

Docket Nos. 50-237; 50-249

Enclosures: 1.

- 1. Notice of Violation
- 2. Inspection Report 50-237;249/97007(DRP)

cc w/encl:

- T. J. Maiman, Senior Vice President Nuclear Operations Division
- D. A. Sager, Vice President, Generation Support
- H. W. Keiser, Chief Nuclear Operating Officer
- T. Nauman, Station Manager Unit 1
- M. Heffley, Station Manager Units 2 and 3
- F. Spangenberg, Regulatory Assurance Manager
- I. Johnson, Acting Nuclear

Regulatory Services Manager

- Richard Hubbard
- Nathan Schloss, Economist

Office of the Attorney General

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Chairman, Illinois Commerce Commission

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Sincerely,

A. Bill Beach Regional Administrator

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J. S. Perry

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Project Manager, NRR w/encl Project Manager Unit 1, NRR w/encl OC/LFDCB w/encl SRI LaSalle, Dresden, Quad Cities w/encl RAC1 (E-Mail) Deputy RA, w/encl TSS w/encl