

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

During an NRC inspection conducted on April 14 through May 12, 1997, six violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

1. Dresden Station Technical Specification 6.8.A required that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, referenced administrative and surveillance test procedures.

Dresden Instrument Surveillance (DIS) 1600-03, "Torus to Reactor Building Vacuum Relief Valve Trip Unit Calibrations," Revision 7, Step D.2 required the performer to obtain Safety Key CB-1 from the operation shift supervisor.

Dresden Administrative Procedure (DAP) 7-14, "Control and Criteria For Locked Equipment and Valves," Revision 8, described the criteria and controls needed for issuing keys and operating locked valves and equipment.

Dresden Administrative Procedure (DAP) 07-27, "Independent Verifications," Revision 13, Section F.1, required that independent verification be performed on all lifted leads involving Technical Specification or safety-related equipment.

Contrary to the above:

- a. On April 14, 1997, an instrument maintenance department (IMD) technician obtained an unauthorized safety key from an IMD key locker and not from the shift supervisor, as required by DIS 1600-03, Revision 7, Step D.2.
- b. On April 18, 1997, a "second check" was performed, in lieu of the DAP 07-27 required independent verification, during the performance of DIS 5700-14, "Reactor Building Vent Stack Flow Monitor Functional Test," Revision 1, Step I.8.c. That surveillance instruction required an independent verifier to "witness" the lifting of a safety-related electrical lead from a terminal block versus the independent verification required by DAP 07-27.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-01a&b)

2. Dresden Station Technical Specification 6.8.A required that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, referenced administrative and surveillance test procedures.

Dresden Instrument Surveillance (DIS) 1600-03, "Torus to Reactor Building Vacuum Relief Valves Trip Unit Calibration," Revision 07, directed test performers to secure equipment in a safe state.

Dresden Administrative Procedure (DAP) 09-13, "Procedural Adherence," Revision 06, required procedure users to verify that the procedure was the current revision or a temporary change.

Contrary to the above:

- a. On April 14, 1997, DIS 1600-03 test performers failed to turn off the power supply to the test modules as directed by the procedure to secure the equipment in a safe state.
- b. On April 23, 1997, test performers failed to verify the correct revision of Dresden Instrument Procedure (DIP) 0700-06, "LPRM Pre-Installation Insulation Resistance and Breakdown Voltage Acceptance Checks," was utilized prior to actual work. The surveillance performer used Revision 2 of DIP 0700-06 when the current revision was Revision 3.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-02a&b).

3. Dresden Station Technical Specification 6.8.A required that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, referenced administrative and radiation protection procedures.

Dresden Administrative Procedure (DAP) 03-23, "Foreign Material Exclusion [FME] Program," Revision 8, required in part: (1) FME controls were required for any work activity, modification, test, inspection or sampling that involved opening a system or component; (2) extra protective clothing, equipment, tools and parts not immediately used that are brought into an FME area will be properly contained while no work was in progress, and (3) Covers must be placed on all systems breached when the opening was left unattended.

Dresden Administrative Procedure (DAP) 12-35, "Donning and Removal of Routinely Required Radiological Protective Clothing and PC Guidelines," Revision 4, Step F.1.j required that TLDs be clipped to the PC pocket with the beta window showing and not covered by fabric, and EDs were to be placed in the pocket.

- a. On April 17, 1997, inadequate FME controls, required by DAP 03-23, were identified in the main steam isolation valve (MSIV) X-room. Excessive amounts of protective clothing, rubber shoe covers, plastic protective clothing, rags and rubber gloves were laying around in the area uncontrolled.

- b. On April 17, 1997, inadequate FME controls, required by DAP 03-23, were identified when electrical maintenance technicians failed to replace the valve cover for Motor Operated Valve 3-220-3 for about two and one-half hours after leaving the work area. The valve's limit switch and electrical connections were left unprotected.
- c. On April 13, 1997, inadequate FME controls, required by DAP 03-23, were identified during a plant tour, when old and new control rod drive scram solenoid pilot valves were observed in an unspecified FME Zone area in Unit 2. The new valves were intended to be installed in Unit 3. The valves were not fully protected at the pipe ends to prevent dirt and debris from entering and degrading the valves.
- d. Between April 14 and April 24, 1997, radiation workers were observed failing to follow DAP 12-35 with regard to the use of TLDs and EDs. Specifically, on at least six occasions radworkers were observed inserting TLDs and EDs into protective clothing pocket without regard to the Beta window.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-03a,b,c&d).

- 4. Dresden Station Technical Specification 6.8.A required that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, referenced administrative and maintenance procedures.

Nuclear Station Work Procedure (NSWP) "ASME and ASME B31.1 Welding," Revision 3, Section 6.4.1, stated in part, when interpass temperature was specified on Exhibit A (weld data sheet), check the interpass temperature upon completion of a weld pass.

Dresden Administrative Procedure (DAP) 15-06, "Preparation, Approval, and Control Of Work Packages and Work Requests," Revision 17, required at a minimum, a copy of the work request for portions of work being performed that day.

Contrary to the above:

- a. On April 22, 1997, maintenance technicians welding on Low Pressure Cooling Injection/Containment Cooling Heat Exchanger "3B" monel stub plate failed to verify interpass temperature as required by the weld data sheet and Weld Procedure NSWP-W-01. Welding was conducted without a temperature stick or pyrometer in the work area to verify interpass temperature.

- b. On April 22, 1997, during the second shift, maintenance technicians were observed performing welding activities on the "3B" heat exchanger monel stud plate without the minimum work package information required by DAP 15-06.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-04a&b).

- 5. Technical Specification 4.9.C.5 stated, in part, that at least once per 60 months, verify that the battery capacity is at least 80 percent of the manufacturer's rating when subjected to either a performance test or a modified performance test (MPT). The modified performance discharge test satisfied both the service test and performance test and therefore, may be performed in lieu of a service test. Since the MPT was subject to the same criteria as a service test, the test was required to be performed in the "as-found" condition as discussed in the Technical Specification Bases 3/4.9.C.

Dresden Electrical Surveillance (DES) 8300-20, "Unit 3 250 Volt Station Battery Modified Performance Test," Revision 02, Step E.3 (Prerequisites), stated: "This test is required to be performed with the battery in the as found condition."

Contrary to the above, on April 22, 1997, the licensee failed to perform a modified performance test on the Unit 3 250 VDC battery in the "as found" condition. Prior to the test, corrective maintenance, which included replacement of a cell, replacement of inter-tier cables, replacement of post seals, and cleaning of the cell to cell connections was performed. In addition, prior to the test, a 222-hour equalizing charge was placed on the battery.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-05).

- 6. Dresden Station Technical Specification 6.8.A required that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, referenced administrative procedures, procedure adherence and temporary change method, and procedural review and approval.

Dresden Electrical Surveillance (DES) 8300-20, "Unit 3 250 Volt Station Battery Modified Performance Test," Revision 02, Step E.3 (Prerequisites), stated: "This test is required to be performed with the battery in the as found condition."

Dresden Administrative Procedure (DAP) 09-13, "Procedure Adherence," Revision 6, Step F.9.a & .c required the cognizant supervisor to ensure: a) "If the Procedural Intent will be affected, THEN perform Step F.2.a of this procedure," and c) "Applicable prerequisites are met." Step F.2.a required that the cognizant supervisor terminate use of the procedure OR perform a permanent change in accordance with station procedure and revision processing.

Contrary to the above, on April 17, 1997, the cognizant supervisor (test director) changed DES 8300-20, based on a corporate engineering recommendation (DOC No. DG-97-000513, dated April 14, 1997) that the "as found" requirement be waived. Deleting the "as found" prerequisite was an intent change, and the cognizant supervisor did not terminate the procedure or perform a permanent change in accordance with station procedure and revision processing.

This is a Severity Level IV violation (Supplement 1) (50-237;249/97007-06).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement of explanation 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). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it 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 include 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.

Dated at Lisle, Illinois,
this 13th day of June 1997