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August 4, 1997

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

SUBJECT: DRESDEN CONFIRMATORY ACTION LETTER MEETING

Dear Mr. Perry:

This refers to the meeting conducted at the Nuclear Regulatory Commission (NRC) Region III Office in Lisle, Illinois, on June 27, 1997. This meeting was to discuss the status of your actions related to the NRC Confirmatory Action Letter (CAL) No. RIII-96-016. As a result of this meeting, the CAL will not be closed pending further review of the effectiveness of the Dresden engineering assurance group in future inspections.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures (the agenda and handouts provided by your staff at the meeting) will be placed in the NRC's Public Document Room.

We appreciate your cooperation in this matter. If you have any questions regarding this meeting, please contact Mark Ring at (630) 829-9703.

Sincerely,

/s/ J. A. Grobe

John A. Grobe, Acting Director
Division of Reactor Safety

Docket No. 50-237
Docket No. 50-249

Enclosures: 1. Attendance List
2. Dresden Station Presentation to
NRC on Status of CAL Action Items

See Attached Distribution

SEE ATTACHED CONCURRENCES

DOCUMENT: G:\DRES\CALMTGMN.627

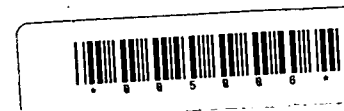
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DATE	07/ /97	07/ /97	07/ /97	08/4/97

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Sincerely,

John A. Grobe, Acting Director
Division of Reactor Safety

Docket No. 50-237
Docket No. 50-249

Enclosures:

1. Attendance List
2. Licensee Presentation,
Dresden Station Presentation to
NRC on Status of CAL Action Items

See attached distribution

~~PLEASE SEE PREVIOUS CONCURRENCES~~

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DATE	07/ /97		08/ /97		08/ /97		08/ /97	

OFFICE RECORD COPY

cc w/encls: 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
Supervisor
I. Johnson, Acting Nuclear
Regulatory Services Manager
Document Control Desk - Licensing
Richard Hubbard
Nathan Schloss, Economist,
Office of the Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

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ATTENDANCE LIST

Commonwealth Edison (ComEd)

Dresden Station

J. S. Perry, Site Vice President
D. Winchester, Manager of Quality & Safety Assessment
F. A. Spangenberg, Regulatory Assurance Manager
J. R. Basak, Engineering Assistance Group Manager
D. Brown, Engineering Assurance Supervisor
G. Abrill, Regulatory Audit Administrator

Corporate Office

E. R. Netzel, Supplier Evaluation Services Director

U.S. Nuclear Regulatory Commission (NRC)

J. A. Grobe, Acting Director, Division of Reactor Safety, RIII
J. A. Gavula, Chief, Engineering Specialists Branch 1, DRS, RIII
G. M. Hausman, Reactor Inspector, DRS, RIII
W. J. Kropp, Chief, Reactor Project Branch 1, RIII
M. A. Ring, Chief, Lead Engineers Branch, DRS, RIII



DRESDEN STATION

*Dresden Station
Presentation To NRC
on Status of CAL Action Items*

June 27, 1997



DRESDEN STATION

AGENDA

- | | | |
|-------------------|---|------------------------------------|
| Russell Freeman | - | Introduction / Opening Remarks |
| Meeting | - | Resolution of Open Items from Last |
| | - | DEAG Recent Activity |
| | - | DEAG Activity Summary |
| | - | DEAG Future Plans |
| Dennis Winchester | - | Summary of Audit Activity |
| | - | Future Internal and Vendor Audits |
| Russell Freeman | - | CAL Closure |
| All | - | Open Discussion |



DRESDEN STATION

Engineering

R. D. Freeman
Site Engineering Manager

Action Items

Action Items from May 12, 1997

- DEAG Staffing
- DEAG Review of 10CFR50.59 Screenings
- DEAG Calculation Sampling

Action Items (Continued)

DEAG Staffing

- Currently at 5 FT / 2 PT vs. original 4 FT / 3 PT
- Added full-time ComEd as DEAG Lead
- Added experienced structural engineer
- Structural, Mechanical, Electrical, and I&C Disciplines

Action Items (Continued)

Review of 10 CFR 50.59 Screenings

- Performing reviews of 10CFR50.59 screenings in conjunction with review of other products such as DCP's, Procedures, etc.
- No inappropriate screenings to date

Action Items (Continued)

DEAG Calculation Sampling

- Monitoring calculation log for new issues
- Random sampling, not statistical
- Reviewing calculation samples from each discipline including vendor calculations

- **Weakness in control of design basis**
 - Action: EAG Reviews, Training
- **Retrievability of design basis information**
 - Action: Calc retrieval program
- **System Impact of Mods not identified**
 - Action: EAG Reviews, Training
- **Discrepancies between design documents**
 - Design Basis Program

Looking Back

Key CAL Actions

- Implement EAG
- Revise NEPs regarding Design Basis Discrepancies
- Perform 12 System Parameter Review
- Reconstitute Design as part of Mods for Key Safety System
- Conduct A/E Audits

Open Item is EAG Effectiveness

DEAG Effectiveness

- DEAG established to provide additional assurance that the design basis is preserved
- Effectiveness demonstrated by high rework %
- Ultimate goal is to eliminate the need for the EAG
- Must improve first line supervisor skills, and worker standards



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DEAG Effectiveness Issues

- Staffing
- Sampling of Engineering Products
- Trending of Review Results
- SQV Unresolved Item
- Processing of DEAG Initiated PIF's



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DEAG Effectiveness

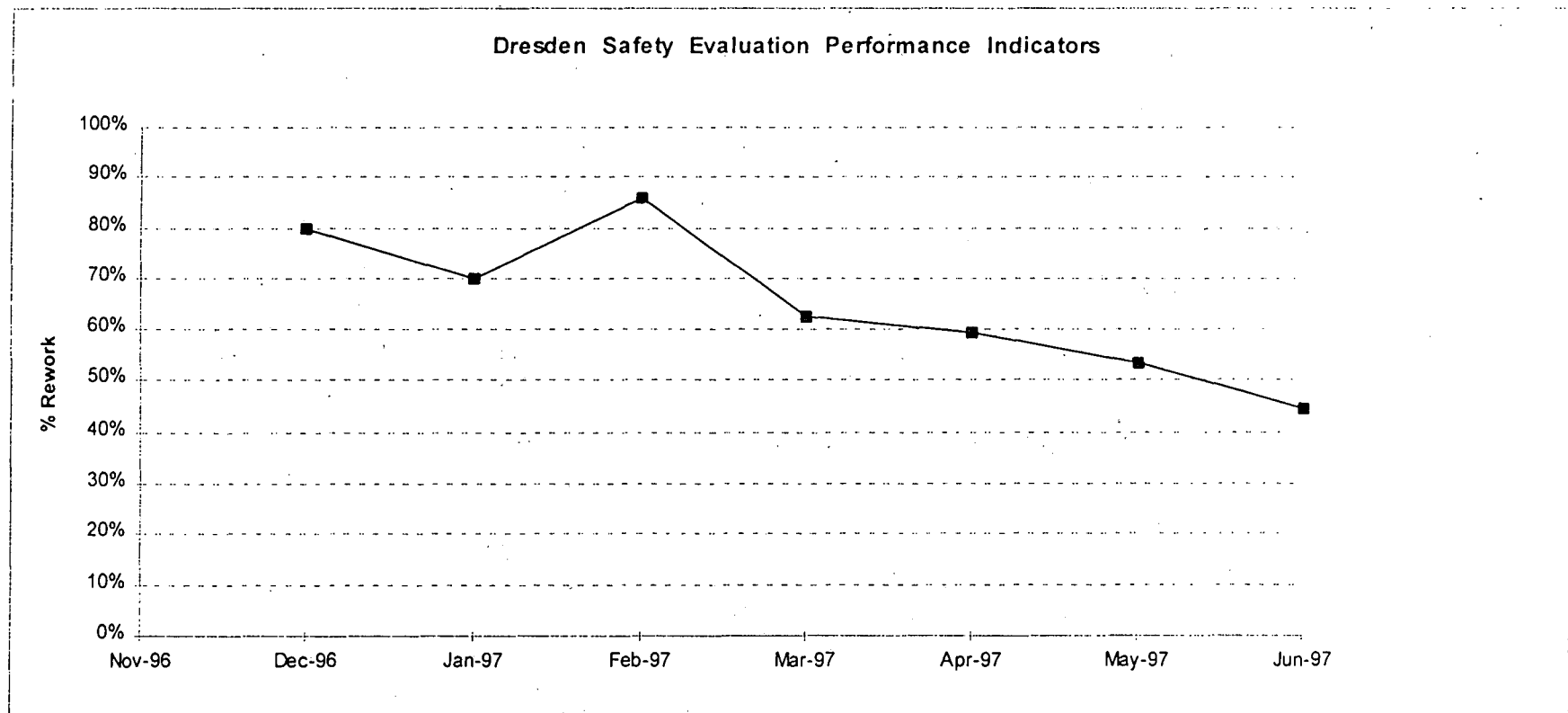
(Continued)

- Organization returned to original size
- Increased cognizance of Engineering Products
- Improved Sampling
- Revised Desk Top Instruction
 - Common Scope at six sites
 - Common grading classification at six sites
- Performance Indicators show improving trends in rework required



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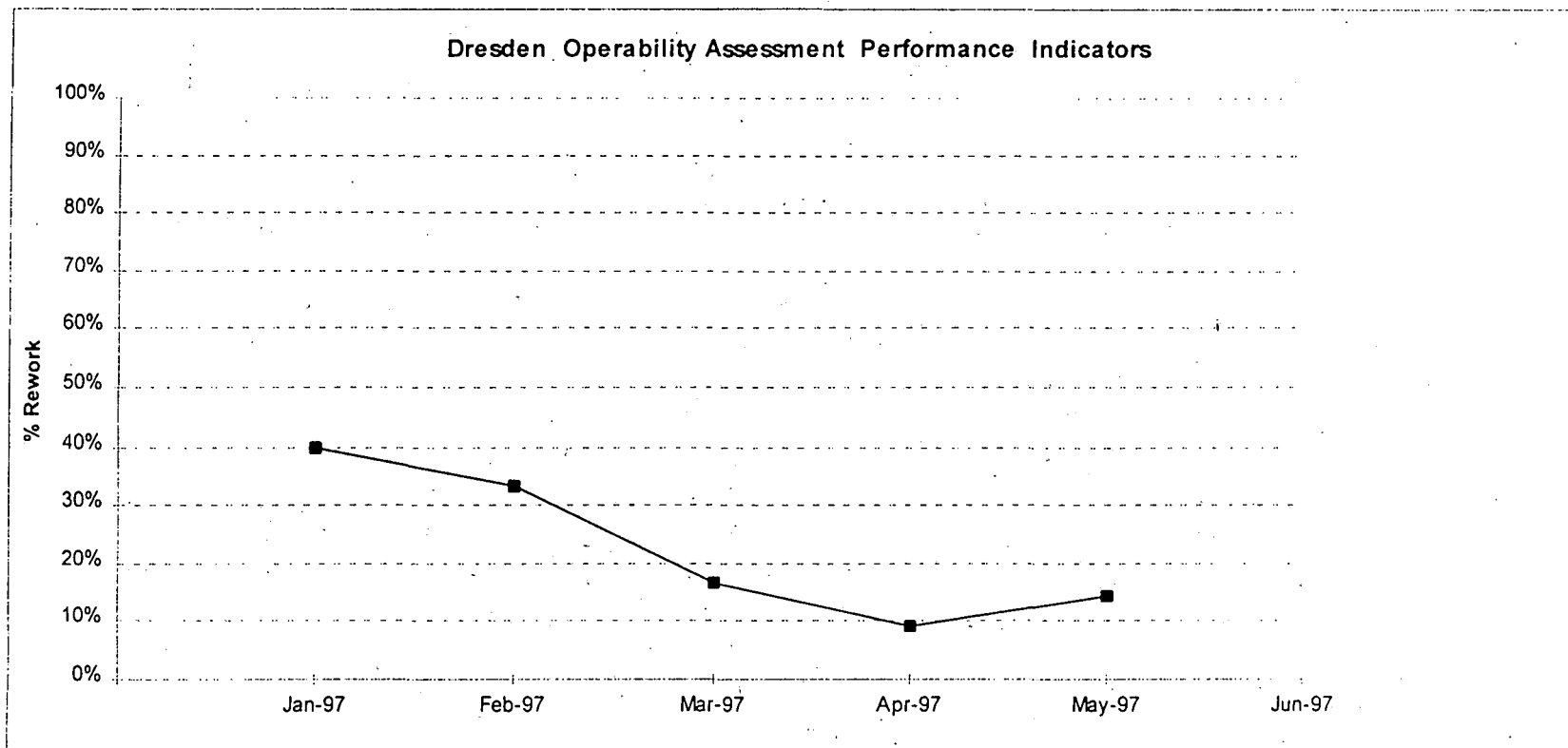
Safety Evaluation Trends





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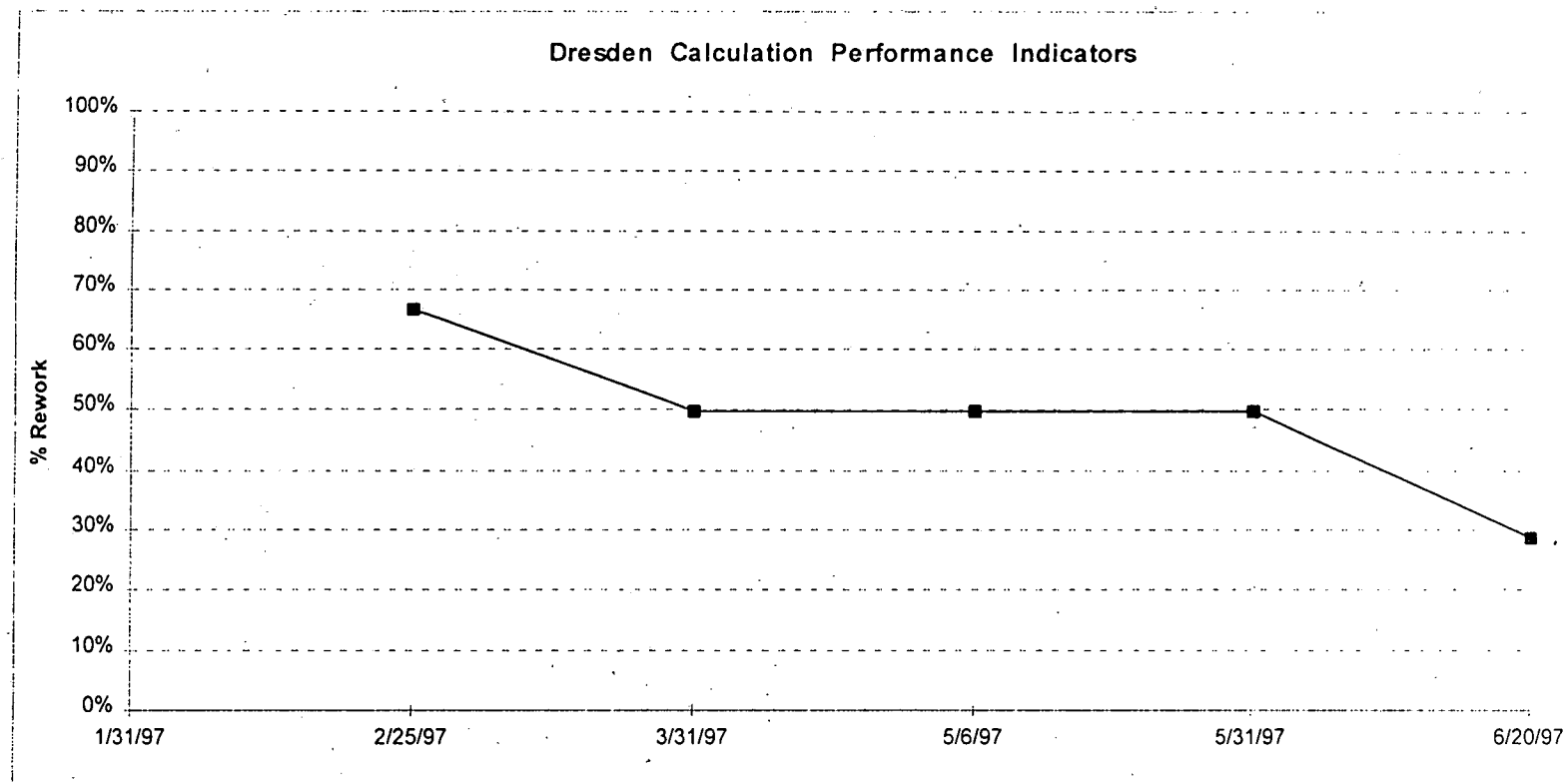
Operability Eval Trends





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Calculation Trends





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Summary of DEAG Activity

	<u>Reviewed</u>	<u>Rework</u>	<u>PIF's</u>
Safety Evaluations	89	49	7
Operability Assessments	50	14	-
Design Changes	46	14	3
Calculations	20	9	5
Special Procedures	8	3	--
LER's	6	3	--
Engineering Evaluations	23	--	--
Other	22	9	--
Total	264	101	15

PIF Trends

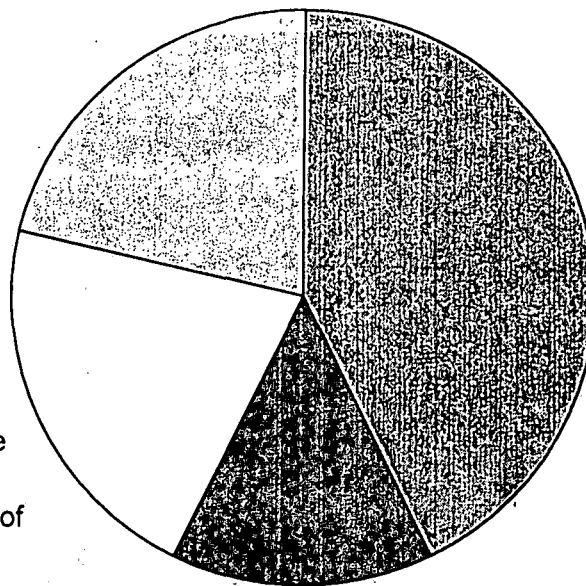
PIF CAUSE CODES

D. Technical error,
attention to detail.
(21%)

C. Inadequate
evaluation or
understanding of
design basis.
(21%)

B. Inadequate
design verification.
(14%)

A. Inadequate
evaluation or
understanding of
regulatory basis.
(44%)



EAG Effectiveness

- Curves show we have made improvements
- We are not ready to disband EAG
- Areas which require further focus
 - Improve the preparer's understanding of Plant Licensing Basis
 - Insure that reviewers spend the time necessary to do a quality review



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DEAG Effectiveness

(Continued)

What we've done about issues

- ESPT Training by DEAG
 - 50.59's in March
 - 50.59, calcs, design changes in June / July
- ESPT Training by Design Engineering Supt.
 - Calcs in June / July
- Immediate feedback to Preparer and First Line Supervisor by DEAG



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DEAG Effectiveness

(Continued)

Problems We've had

- Initial Focus on mentoring and supporting rather than monitoring and reporting
- PIFs not getting through First Line Supervisors - set Expectations
- Tracking system not established early on

DEAG Effectiveness

(Continued)

How To Improve?

- Additional training on licensing / design basis
- Reduce the number of qualified reviewers and require them to attend advanced training

Conclusions

- DEAG is effective at identifying problems
- Engineering Management is listening and using direct feedback and training to improve line performance
- It's time to close the CAL

Future Action

- Provide written update of status in December
- Report on station plan for future DEAG activities
- Incorporate DEAG function into organization



DRESDEN STATION

SQV

Dennis Winchester

SQV Manager



DRESDEN STATION

SQV Coverage

- Significant Portion of the Commitments are Complete

SQV Coverage

- Audit Results
 - ComEd and Vendor Standards Raised
 - Design Control (Calculations)
 - Engineering Interface
 - 50.59 Evals
 - Procedures
 - Audits
 - Corrective Action Monitoring



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SQV Coverage

- Station Integrated Design Control Audits
- Initial Audit of primary AE's
- Initial Audit of Fuel Suppliers
- Audit Schedule Approved for Continued Coverage