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October 14, 1997

JSPLTR #97-0173

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

Subject: Dresden Station Units 2 and 3  
Confirmatory Action Letter (CAL) Action Item Update  
NRC Docket Nos. 50-237 and 50-249

- Reference:
- (1) NRC Confirmatory Action Letter RIII-96-016, A. Bill Beach to J. S. Perry dated November 21, 1996.
  - (2) J. S. Perry letter of December 6, 1996 to A. Bill Beach NRC Region III
  - (3) J. S. Perry letter of November 8, 1996 to A. Bill Beach NRC Region III
  - (4) J. S. Perry letter of May 30, 1997, JSPLTR #97-0100, Confirmatory Action Letter (CAL) Action Item Update

The purpose of this letter is to provide an update of the Dresden Engineering Department's progress in preparing to close out the CAL as forwarded to us by reference (1). The bulk of this letter will discuss the activities of the Dresden Engineering Assurance Group (DEAG) and will also address staffing modifications as initially described in reference (2).

The DEAG, as described in reference (2), was originally established as a group of seven contracted engineers. Currently, the number of products being produced by engineering is reduced from the first quarter of the year. This is primarily due to the improved operating performance of the units. Accordingly the DEAG group has been reduced to one full-time ComEd engineer, three part time ComEd engineers and one part time contractor with efforts underway to hire an additional full-time ComEd engineer. The ultimate goal is to have two full time and two part time ComEd Engineers assigned to the DEAG. Additional outside support will be provided as necessary.

OCT 21 1997

As the attachments show, Dresden Station continues to implement the commitments made in reference (3) and as reiterated in reference (2). Attachment (1) to this letter is a tabular representation of the commitments in reference (2) with the status of each commitment provided, including the document in which completion was reported.

The major actions for the commitments have been completed as reported in reference (4), and only ongoing activities (attachment 1, items 5, 6, 8, and 11) remain open. Of these open activities, two involve issues that require closure. These are the effectiveness of the DEAG and the corrective actions of the Audits of NSSS and AE vendors.

Attachment (2) provides a record of DEAG oversight activities performed since May. The DEAG has been effective at identifying areas for improvement in the Engineering documentation listed and the trend shows that the DEAG has made a positive impact on the quality of Engineering products. The DEAG will continue to provide a written monthly report to Engineering Management which will also be made available to the NRC.

Quality and Safety Assessment (Q&SA) has determined that overall the DEAG has been effective in their engineering reviews and is providing a useful product to the station. Due to concerns during the Design Control Audit in April, 1997, a Corrective Action Record (CAR) 12-97-39, "DEAG Effectiveness" was issued as an Unresolved Item pending Q&SA review of additional DEAG activities. Since that time, Q&SA has performed several assessments of the DEAG and concluded they are effective in their reviews of Engineering's products. Consequently the Unresolved Item was signed as closed on 09/23/97.

ComEd has completed the initial audits of the primary AE's, NSSS vendors, and Nuclear Fuel Vendor in response to the Dresden ISI as scheduled. The audits focused on design control, problem identification & notification, and vendor/ComEd interface.

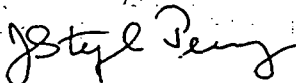
Attachment (3) provides a record of audit activities conducted by ComEd and the results. A review of the results from the AE audit showed three common types of weaknesses; 1) calculations containing design control deficiencies, 2) ineffective independent design reviews, and 3) internal audits were programmatic and not effective in identifying technical issues. To date, there have been no deficiencies which required a modification to the plant. Some of the deficiencies found have required revisions to existing calculations. However, the lack of programmatic controls associated with design calculations found by ComEd's audit of G.E. Nuclear Services, San Jose, resulted in a stop work order being issued to G.E.. The stop work order is currently in effect while the issues are being resolved. The 1998 audit schedule is currently being developed and will reflect the results from the 1997 audits.

USNRC  
October 15, 1997

JSPLTR 97-0173  
Page 3

Supported by the information provided in this update and the October quarterly meeting, we propose the CAL be closed at Dresden after the October 15 meeting. If you have any questions concerning this issue, please contact Mr. Russell Freeman, Dresden Station Site Engineering Manger, at (815) 942-2920, ext. 3700.

Sincerely,



J. Stephen Perry  
Site Vice President  
Dresden Station

Attachment: (1) CAL Commitment Status  
(2) Summary of DEAG Activity  
(3) Summary of AE/NSSS Audit Results

cc: A. Bill Beach, Administrator USNRC Region III  
J. F. Stang, Project Manager, NRR  
K. Riemer Acting Senior Resident Inspector, Dresden Station  
Office of Nuclear Facility Safety - IDNS

ATTACHMENT 1  
DRESDEN STATION  
CAL COMMITMENT STATUS

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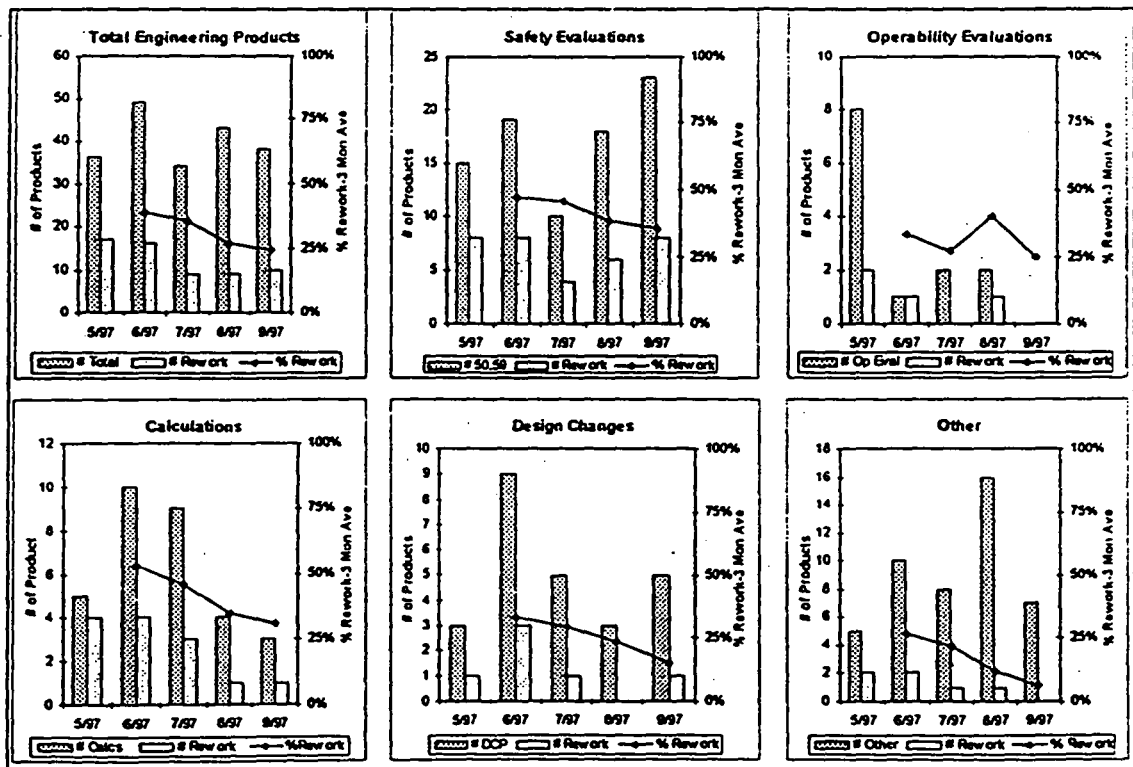
A.B. Beach Letter of November 21, 1996

ACTION SPECIFIED	STATUS	REPORTED BY
1. Establish Engineering Assurance Group	Complete	JSPLTR Dec. 6, 1996
2. Revise Nuclear Engineering Procedures to provide specific direction when a potential design basis discrepancy is identified	Complete	JSPLTR Feb. 7, 1997
3. Revise Nuclear Engineering Procedure to provide clearer guidance for review and update of calculations	Complete	JSPLTR Dec. 6, 1996
4. Screen key parameters of twelve systems most important from a risk perspective	Complete	JSPLTR Feb. 28, 1997
5. As future modifications are designed, validate/reconstitute design basis/calculations for equipment/systems affected by the modification.	On-going	JSPLTR May 30, 1997
6. Audit NSSS suppliers and Architect/Engineers	On-going	JSPLTRs Dec. 30, 1996; Feb. 7, 1997; & May 30, 1997
7. Detail the membership & background of EAG members, charter, responsibility, EAG Implementing procedures.	Complete	JSPLTR Dec. 30, 1996 & Feb. 7, 1997
8. Provide results of EAG actions and results to NRC on a monthly basis.	On-going	Monthly DEAG Report
9. Provide results of screening of 12 systems to NRC on a monthly basis.	Complete	JSPLTR Feb. 28, 1997
10. Inform NRC if any critical parameters are outside of normal acceptance range.	Complete	JSPLTR Feb. 28, 1997
11. Provide schedule and results of NSSS and AE audits on monthly basis	On-going	Monthly SQV Issues Report

**ATTACHMENT 2**  
**SUMMARY OF DEAG ACTIVITIES**  
(5/1/97 THROUGH 9/30/97)

Documents	Total Number Reviewed	Number with Rework	Number of PIF's
Safety Evaluations	85	34	7
Operability Assessments	13	4	-
Design Change Activities	25	6	2
Calculations	31	13	7
Other	46	4	1
<b>Total</b>	<b>200</b>	<b>61</b>	<b>17</b>

**DEAG Rework Trends, May through September, 1997**  
(Attachment to September, 1997 DEAG Report)



**ATTACHMENT 3  
AE/NSSS AUDIT RESULTS**

<u>Vendor</u>	<u>Location</u>	<u>Status</u>	<u>Results</u>
Bechtel	a) Gaithersburg, MD Byron/Braidwood SGRP	Completed	1 Finding; 1 URI
	b) Quad Cities	Completed	2 Findings; 1 URI
	c) Dresden	Completed	3 Findings
Duke	a) Naperville, IL	Completed	4 Findings; 1 URI
	b) C/A Follow-up	Scheduled for 12/97	
S&L	a) Chicago, IL Dresden Station	Completed	6 Findings
	b) C/A Follow-up	Completed	Closed 4 Findings
Westinghouse Fuel	a) Columbia, SC	Completed	No Findings; 1 URI 4 Findings; 4 URI's
	b) Monroeville, PA	Completed	
Siemens Fuel	a) Richland, WA	Completed	3 Findings
	b) Richland, WA	Scheduled for 9/29/97 - 10/3/97	
General Electric (NSSS)	Nuclear Energy; San Jose, CA	Completed	9 Findings; 3 URI's
Westinghouse (NSSS)	ESBU; Monroeville, PA	Completed	2 Findings; 1 URI

URI = Unresolved Issue