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October 24, 1997

### JSPLTR: 97-0184

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 50-237; 249/97008. NRC Docket Numbers 50-237, and 50-249

Reference:

J. A. Grobe letter to J. S. Perry, dated September 25, 1997, transmitting NRC Inspection Report 50-237; 249/97008 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted in the above reference. Specifically, the violation resulted from the temporary loss of thirteen Problem Identification Forms (PIFs) which were initiated during the review of the twelve most risk significant systems, and the subsequent delay in entering them into the PIF tracking system.

In July 1997, Dresden Station initiated an electronic PIF system which provides a tracking mechanism as soon as a PIF is generated which will prevent the recurrence of this violation.

A second violation identified the failure to follow the Desk Top Instruction (DTI) which governs the activities of the Dresden Engineering Assessment Group (DEAG). This item was closed by the inspector in the above reference. Dresden agrees with the description of the events and the corrective actions described in the report and has no further comments on this violation.

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

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USNRC JSPLTR 97-0184 October 24, 1997 Page 2 of 2

This response contains no proprietary information. 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,

J. Stephen Perry Site Vice President Dresden Station

Attachment

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

# **RESPONSE TO NOTICE OF VIOLATION**

### NRC INSPECTION REPORT 50-237;249/97008

#### **Violation**

10 CFR 50 Appendix B, Criterion XVI, "Corrective Action" state, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Dresden Administrative Procedure 02-27. "The Integrated Reporting Process," Revision 7, established measures to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified, classified and corrected.

NEP 10-03, "Disposition of Design Basis Discrepancies," Revision 0 (1/20/97), Step 5.2.1, requires that upon identification of a discrepancy between design documents, the Updated Final Safety Analysis Report (UFSAR), or the physical plant, a Problem Identification Form (PIF) is initiated.

Contrary to the above, as of April 3, 1997, the PIF process did not ensure that conditions adverse to quality were promptly identified and corrected. Specifically, 13 discrepancies regarding conditions adverse to quality for the 12 most risk significant systems were lost or misplaced. As a result, the 13 discrepancies were not entered or identified in the PIF tracking system.

#### **Reason for Violation**

Thirteen PIFs written to address issues related to discrepancies identified during review of the 12 most risk significant systems were misplaced before the engineering supervisor signed them and they were entered into the PIF system.

The 13 missing PIFs were all associated with one engineering group supervisor who was working part time due to medical problems during the review of the 12 risk significant systems. The PIFs were turned over to the group supervisor for review but were not immediately processed because the group supervisor determined that additional research was required to validate and adequately document the issue discussed in the PIFs. A preliminary review of the PIFs was performed (although not documented) to verify that no immediate operability or safety concerns were associated with the PIFs. While the group supervisor was on medical leave, the PIF reviews were not completed because of miscommunications between the group supervisor and the person covering for him at the plant.

Page 1 of 2

At the time the PIF system used hand-written PIF forms which were hand carried from the originator to a supervisor for signature and then carried to the Operations Group. Formal tracking of PIFs did not occur until they were received by the Operations Group. At the time of the violation, there was no tracking mechanism to identify PIFs that had not been signed by the supervisor.

The missing PIFs were identified by review of discrepancy logs kept by the team performing the 12 risk significant system reviews.

### Corrective Steps Taken and Results Achieved

Copies of the missing PIFs were retrieved from the files of the group performing the 12 system reviews. The PIFs were recreated and processed per Station procedures. No operability or safety concerns were identified during processing of the PIFs.

The group supervisor who misplaced the PIFs was counseled on the need to expeditiously process PIFs. Processing of PIFs was discussed (at a tailgate) with all Design Engineering personnel, the general guideline of a 24 hour time frame between PIF initiation and signature was provided to engineering personnel at the tailgate.

## Corrective Steps Taken to Avoid Further Violation

Actions to avoid future violations of this type have been completed.

Subsequent to this violation, Dresden implemented an electronic PIF system. The system assigns a PIF number when the PIF is signed by the originator. The originator gives the PIF number to the appropriate supervisor who is responsible to access and sign the PIF electronically. When the supervisor signs the PIF, it is automatically routed to the operations group for review.

The PIF is available on the network for review after it is signed by the originator. The system also allows tracking of PIFs that have been unsigned by a supervisor for over 24 hours. Reports are run to identify these PIFs and this information is given to appropriate management personnel for action.

## Date when Full Compliance will be Achieved

Full compliance was achieved on July 21, 1997 when the electronic PIF system was initiated.