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March 11, 1998

JMHLTR: #98-0060

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 50-237/249/97028
NRC Docket Numbers 50-237 and 50-249

Reference: G. Grant letter to O. W. Kingsley, dated February 6, 1998, transmitting
NRC Inspection Report 50-237/249/97028 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the three violations denoted in the Notice of Violation transmitted by the above reference. The first violation was for failure to provide employee feedback forms which were required by administrative procedure. The second was for operation of a battery charger without the required Category 1 procedure in hand. The third violation was for failure to secure hoses which crossed contaminated areas in violation of the governing administrative procedure.

The report noted that corrective actions had been taken for the first violation and no response was required. The report accurately describes the violation and corrective actions.

The second violation is the result of an error on the part of a First Line Supervisor. corrective actions are described in the attachment.

The corrective actions for the third violation, control hoses crossing contamination boundaries, is discussed in the attachment.

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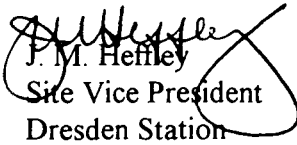
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The Inspection Report noted shortcomings in the verification of prerequisites for procedures and proper documentation of work request status in the Electrical Maintenance Department (EMD). Specific corrective actions for EMD and other Station departments are described in the attachment.

This response contains no proprietary or safeguards 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. M. Hefley
Site Vice President
Dresden Station

Attachment

cc: A. Bill Beach, Regional Administrator, Region III
M. Ring, Branch Chief, Division of Reactor Projects, Region III
L. Rossbach, Project Manager, NRR (Unit 2/3)
K. Riemer, Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety - IDNS

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/249/97028
97028-02

Violation

Dresden TS 6.8.A.1. required that written procedures be implemented covering the activities recommended in Appendix A of RG 1.33, Revision 2, February 1978. The guide recommended procedures covering maintenance work. Dresden Administrative Procedure (DAP) 09-13, "Procedural Adherence," Rev. 06, required continuous use of a Category 1 procedure.

Contrary to this, on December 13, licensee personnel performed work without continuously using the appropriate Category 1 procedure. As a consequence, licensee personnel incorrectly manipulated equipment. The switch failed, causing the 125-volt direct current battery charger to trip. This was a violation (VIO 50-237/97028-02 (DRP); 50-249/97028-02 (DRP)).

Reason for Violation

Personnel Error was the reason for the violation. Perceived time pressure by the maintenance supervisor contributed to the event. In addition the supervisor lost his objectivity as a supervisor when workers observed amperage readings lower than anticipated. The supervisor became involved with the actual work and began troubleshooting techniques in an attempt to rectify what he assumed was low amperage readings.

The supervisor perceived he was under time pressure and attempted to implement the original schedule and expedite the work without considering the impact of increased scope. The workers observed what they thought were low amperage readings, when, in fact, the amperage readings were acceptable because the battery was near full charge. The supervisor proceeded to the battery charger in an attempt to diagnose the problem. Upon arrival, he assumed the battery charger was similar to others found on site which require that both the float/equalize and timer toggle switches be manipulated to place them in equalize.

The supervisor lost objectivity and focus when he actuated the switch he believed was in the incorrect position to correct a perceived problem without conferring with workers. When the toggle switch, which was later determined to be defective, was placed in equalize he observed the voltage drop to float values and rise back to the equalize value. The supervisor informed the workers of his actions. The workers pointed out in the procedure that the toggle switch should have been left in the float position. The supervisor did not refer to the Category 1 procedure and therefore performed a critical step incorrectly. He became involved with troubleshooting and not with technically analyzing the situation.

Corrective Steps Taken and Results Achieved

A Problem Identification Form (PIF) was generated documenting that operation of equipment without a Category 1 procedure in hand had occurred. The Supervisor was removed from his duties in accordance with established management practices. The supervisor was required to perform an Apparent Cause Evaluation (ACE) and other remediation. The supervisor was disciplined in accordance with station approved policies.

The faulty toggle switch was subsequently repaired.

Corrective Steps Taken to Avoid Further Violations

The supervisor involved provided a briefing of the event in the Electrical Maintenance Department weekly meeting. This action was part of the Apparent Cause corrective item. This item was included in an all station information notice (tail gate package) on 12/31/97 and was included in the station newspaper. Additionally, because of the seriousness of this event, the station reset its event free clock.

The supervisor was tasked with reviewing DAP 09-13 Procedure Adherence and providing refresher training to EMD supervision. Additionally, the EMD Superintendent personally administered an oral exam before the individual was reinstated as a supervisor.

The EMD Superintendent orally examined all EMD Supervisors and a representation of craft personnel on the requirements of DAP 09-13 and the need to address the perceived time pressure issue.

Although not included with the Notice of Violation, the Inspection Report noted a lack of rigor in the use of "CM" for Conditions Met when verifying that prerequisites are complete. The EMD Superintendent confirmed that all prerequisites were actually met prior to performing the activity; however, the documentation was deficient.

In the oral test mentioned above, the EMD Superintendent included a discussion of the correct use of "condition met" when verifying that prerequisites are complete.

The following additional actions are being taken because this deficiency may apply to other Station departments:

- The Maintenance Department will provide a specific tailgate on procedure adherence in the areas of checking for prerequisites and the proper use of Conditions Met (CM) during the performance of steps within a procedure.
(NTS Item 237-100-97028-0001 due 8 April 1998)
- Maintenance Department will evaluate present procedure adherence trends over the last three months and similar data during D2R15 performance monitoring to determine the need for specific procedure adherence training. The evaluation will include trends in checking for prerequisites, the use of "Conditions Met" (CM), proper documentation of work completed such as; last work step completed, and job status such as; task placed on hold pending investigation of procedure adherence event.
(NTS 237-100-97028-0002 due May 29, 1998)
- The Q&SA Department has added a verification of prerequisites to procedure adherence to the generic Operations and Maintenance Field Monitoring Activity schedule for March 1998.
- As discussed in the Stations response to the January 2, 1998 Systematic Assessment of Licensee Performance (SALP 15), dated February 12, 1998, the Maintenance Department will implement a scorecard process similar to the program recently used to enhance Operations performance. One of the observation cards will be procedure adherence. This scorecard will have specific criteria to verify prerequisites and proper completion of each procedure step in accordance with procedure adherence requirements. (NTS 237-100-97-001-01 due 1 June 1998)
- The Operations Department performs a number of monthly peer reviews on a random basis to verify that surveillance procedures are properly documented.
- To assist in improvement of work practices in the interim time before implementation of the NGG Maintenance Scorecard Program on June 1, 1998, the maintenance department has developed a Performance Monitoring Program (First Line Supervisor Policy 2.7) similar to the Scorecard program recently used by Operations for improved personnel performance. The program has specific procedure adherence, work documentation, and other work practice observation verification criteria such as those discussed in this Notice of Violation. This program has been approved by the

Maintenance Manager and has been partially implemented during D2R15. During D2R15 there are 13 specific senior managers assigned to perform field monitoring during the first 2 weeks of D2R15. Other selected station management personnel have also been designated to perform human performance monitoring in the field throughout the outage. They are using the monitor forms from the above recently developed Maintenance Performance Monitoring Program as a tool for identification and correction of human performance errors in the field. Full implementation of the program for individuals in the operating unit is expected by April 3, 1998. (NTS Items 237-225-97R12-97232 and 237-225-97R12-97233)

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on December 13, 1997.

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/249/97028
97028-03

VIOLATION

Dresden Technical Specification 6.8.A required that written procedures be implemented covering the applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978. The guide recommended administrative procedures.

Dresden Administrative Procedure (DAP) 03-07, "Control of the Service Air and Domestic Water Systems and Hoses for General Station Use," Revision 09, Step F.3.a., stated "IF a RED, WHITE OR CLEAR hose must cross the boundary between a contaminated area AND a non-contaminated area, THEN the hose must be secured at the boundary using Radioactive Materials tape."

Contrary to this, on December 19, 1997, a white hose that crossed the boundary between a contaminated area boundary and a non-contaminated area (a step-off-pad in the Unit 2 east torus basement area) was not secured at the contamination area boundary.

REASON FOR VIOLATION

The hose in the torus basement was not properly secured as a result of inadequate human performance. This Notice of Violation and the station's own assessment observations indicate that radiation worker performance in the RPA does not meet the established standards. The proper emphasis has not been placed on these deficiencies throughout the levels of management at the station, and therefore the proper standards have not been reinforced with the workforce in an effective manner.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A Problem Identification Form (PIF) was generated to document the event. The Radiation Protection department was notified and the hose was properly secured at the contaminated area boundary.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

- Operations will reinforce the proper controls of hoses that are used for draining of plant equipment. This will be performed through crew briefings and daily orders. This item is completed.
- Maintenance will reinforce the proper controls of hoses during pre-job briefings. This expectation is included in Supervisor and Crew Pre-Job Briefing Checklist C for DAP 15-06, "Preparation, Approval, And Control Of Work Packages And Work Requests". This item is completed.
- Dresden Policy Statement # 57, "Management Oversight Policy" describes four areas of management oversight. One of the specific areas is *Management By Walking Around (MBWA)*. The Radiation Protection Manager will discuss proper control of hoses at contaminated area boundaries in a letter to MBWA participants to increase their awareness when performing management field oversight. This will be completed by March 31, 1998. (NTS 231-100-97-028-0303).
- As discussed in the Station's response to the January 2, 1998 Systematic Assessment of Licensee Performance (SALP 15), dated February 12, 1998, the Radiation Protection Department will implement a scorecard process similar to that which was recently used to enhance Operations performance. One of the specific observation criteria will be to verify that hoses crossing contaminated area boundaries are properly secured. This process is expected to be fully implemented by June 1, 1998. (NTS 237-100-97-001-07).
- To assist in improvement of work practices in the interim time before implementation of the Radiation Protection scorecard program on June 1, 1998, the Radiation Protection Department will utilize the Maintenance Department Performance Monitoring Program (First Line Supervisor Policy 2.7). This program includes specific procedure adherence and other work practice observation verification criteria such as those discussed in this Notice of Violation. During D2R15 there are selected senior managers assigned to perform field monitoring utilizing this program during the first 2 weeks of the outage. Other selected Radiation Protection management personnel will be assigned to use the monitoring forms from the above referenced program as a tool for identification and correction of human performance errors in the field. Full implementation of the program for Radiation Protection management personnel is expected by April 3, 1998. (NTS 237-100-97-028-0305)

- Personnel found in violation of Dresden radiation worker standards and expectations, including hose controls, will be locked out of the RPA, in accordance with Radiation Protection Policy Memo # ADM-09, "Failure to Maintain Radiation Worker Standards." Re-entry into the RPA will not be allowed until the Supervisor and/or the Department Head meet with the worker and develop corrective actions to correct the employee performance. The individual and Supervisor will be required to review the completed action items with the RP Supervisor (or RPM/designee for serious deficiencies) prior to reinstating their RPA access.
- A station tailgate will be written to reinforce proper controls of hoses that cross contaminated area boundaries. This tailgate will raise the awareness of station radiation workers in regards to this fundamental contamination control work practice. This will be completed by March 17, 1998. (NTS 237-100-97-028-0304).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on December 19, 1997 when the hose in the torus basement was properly secured.