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ComEd

April 27, 1998

JMHLTR: #98-0124

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 50-237/249/98005
NRC Docket Numbers 50-237 and 50-249

Reference: (a) J. A. Grobe letter to O. D. Kingsley, dated March 26, 1998, transmitting NRC Inspection Report 50-237/249/98005 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted by reference (a). The violations were for (1) inadequate procedural guidance for operating the Emergency Diesel Generators (EDG) and (2) failure to maintain current medical examination data for a licensed operator. The response to the Notice of Violation appears in the attachment.

Dresden is committing to the following actions:

1. Operations Department will affirm its ownership of procedures through performance of a collegial review of Operating Procedures associated with specific systems. The first systems to review include: Shutdown Cooling (SDC), Reactor Building Closed Cooling Water (RBCCW), Emergency Diesel Generator (EDG), and Feedwater (FW). The review will be undertaken by members of the Operations, Engineering, and Training Departments to assure the technical accuracy of these procedures. This is scheduled for completion by September 28, 1998. (NTS 237100980030102)

2. Operations Department has committed to reviewing the station's existing administrative process for medical certification of licensed operators and proposing revision which would strengthen the program by August 19, 1998. (CAR 12-98-022).

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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. Heffley
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
50-237/98005, 50-249/98005
98005-01

VIOLATION:

Dresden Technical Specification 6.8.A requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Procedures addressing the operation of emergency diesel generators are recommended in RG 1.33.

Contrary to the above:

A. As of March 3, 1998, the licensee failed to maintain operating procedure DOP 6600-02 sufficiently to operate the emergency diesel generator (EDG) by not providing adequate procedural guidance regarding the setup and EDG running volts, AC amperes, and Kilowatts measured for an automatic start condition.

B. Between August 21, 1996 and March 3, 1998, the licensee failed to maintain operating procedure DOP 6500-09 sufficiently to operate the EDG by not providing adequate procedural guidance regarding the unloading of the generator and opening of the main circuit breaker.

REASON FOR VIOLATION:

These violations were found to exist as a result of a lack of procedural ownership by the Operations Department, specifically with procedures that are not frequently used. Performance in this area was found to be less than acceptable and failed to meet Operations Standards of Excellence.

NRC oversight of Operator performance during EDG tasks at the plant specific simulator identified that the operators had difficulty in obtaining precise values of 60 Hertz and 4160 Volts, which was required by procedure to place the synchroscope into service. The simulator model of EDG controls accurately mimics the EDG response but creates a more challenging environment for the Operator from which he gains greater sensitivity in the area of EDG control. Operators, upon completion of Licensed Operator initial training, find that controls for the station EDGs are as functional as those modeled in the simulator; however actual operation of the station EDGs is less challenging and easier. Review of operator performance on the station EDGs found no historic events resulting from operator manipulation of voltage or frequency controls.

A review was performed which validated that Dresden Operating Procedure (DOP) 6600-02, Precaution section, did provide the operator inaccurate information. Specifically the procedural statement that "a failure to set the droop to 5, voltage to 4160 and frequency to 61 Hertz could affect the EDG performance under an autostart condition," is inaccurate. On April 26, 1998, station procedures were reviewed and revised to change the EDG standby frequency from 61 Hertz to 60 Hertz to comply with Technical Specifications and Engineering recommendations. Operations review of other EDG procedures found that this change was implemented in all procedures referencing shutdown of the EDG, yet this procedure failed to be revised. It became evident that DOP 6600-02, "EDG Startup," was missed in the procedural revision process caused by the assumption that the EDG startup procedure would not contain shutdown setup criteria. Therefore, this failure to revise DOP 6600-02 resulted from a lack of diligence by the individual performing the procedural revisions. To shutdown the EDG, DOP 6600-03 "Diesel Generator 2(3) Shutdown" and 6600-06 "Diesel Generator 2/3 Shutdown" are used which have proper procedural steps to assure proper setup for auto-start.

The NRC observation that DOP 6600-02 lacked guidance for parameter criteria for voltage, frequency and loading, is accurate. Further review found that this condition also exists in DOP 6600-05, "2/3 EDG Startup," but in both cases is limited to automatic start only. From this lack of operator guidance, it could only be assumed that the operator was expected to perform loading activities through "craft capabilities". Dresden agrees that additional procedure guidance is appropriate.

We agree that procedural guidance to properly load and unload the EDG prior to opening of the EDG output breaker was not consistent within various EDG procedures and is needed.

These conditions have existed since Revision 0 of these procedures, and Operations was unable to determine why these two procedures were not properly revised when all of the others were.

CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED:

Corrective measures to date include revision to all EDG related Operating Procedures and Surveillances to include guidance on EDG unloading prior to opening of the output circuit breaker. With this procedural revision in place, an EDG high current transient is averted.

DOP 6600-02, "EDG 2(3) Startup," and DOP 6600-05, "EDG 2/3 Startup," were revised to incorporate acceptable parameter guidance and controls for conditions where the EDG has autostarted and to correct the improper frequency reference. DOP 6500-09 "Bus 24-1 To Bus 34-1 Tie Breaker Operation Utilizing U2(3) D/G," was revised to provide procedural guidance regarding the unloading of the generator and opening the output breaker.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

Operations Department will affirm its ownership of procedures through performance of a collegial review of Operating Procedures associated with specific systems. The first systems to review include: Shutdown Cooling (SDC), Reactor Building Closed Cooling Water (RBCCW), Emergency Diesel Generator (EDG), and Feedwater (FW). The review will be undertaken by members of the Operations, Engineering, and Training Departments to assure the technical accuracy of these procedures. This is scheduled for completion by September 28, 1998. (NTS 237100980030102)

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Partial compliance was achieved on March 29, 1998, with the incorporation of procedural guidance to prevent a high current transient when unloading the EDG generator. Further EDG procedural reviews and revisions will ensure that the EDG procedures are consistent and contain accurate technical information.

Full compliance was achieved on April 24, 1998, when DOP 6500-02, DOP 6600-05, and DOP 6500-09 were revised.

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/98005(DRS), 50-249/98005(DRS)
98005-02

VIOLATION:

10 CFR 55.27 requires, in part, that the facility licensee shall document and maintain the results of medical qualification data and test results for each operator, and provide the documentation to the Commission upon request.

Contrary to the above, as of February 13, 1998, the licensee failed to maintain the required documentation of current medical examination data for a licensed operator that exceeded the biennial medical evaluation due date.

REASON FOR VIOLATION:

Medical department personnel lost the documentation for an operator's biennial medical examination that was completed on January 6, 1998. The loss of the documentation was discovered by NRC inspectors while performing an inspection of the licensed operator continuing training program during the period February 9 - 13, 1998. The licensed operator's biennial medical examination expired on January 31, 1998, and thus the documentation required by 10 CFR 55.27 was not available.

The station procedure, TDI-502, "Administrative Process for NRC Licenses," Revision 03, January 1996, requires that licensed operator medical examinations be completed at least 60 days prior to the medical expiration date to ensure on time processing. Failure to adhere to this procedural requirement and to provide timely follow up with medical personnel led to this violation.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

A search for the missing examination was commenced upon discovery of the discrepancy. When the search failed to produce the documentation, a Problem Identification Form (PIF) was generated documenting the lost medical examination paperwork. The licensed operator was immediately re-evaluated by a physician, and found to be medically qualified to perform licensed duties.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

The deficiency cited by the NRC is an individual performance problem caused by the License Coordinator's failure to follow the requirements of the station procedure governing operator biennial medical examinations scheduling and completion. The License Coordinator has been counseled by their supervisor in accordance with station policy.

Following the NRC inspection, the station's Quality and Safety Assessment department performed a review to determine the adequacy of the station's program to medically certify licensed operators. As a result of this assessment, (CAR 12-98-022) the Operations Department was tasked to develop an action plan by August 1998, to prevent recurrence of deficiencies such as that found by the NRC. Integral to this action plan is a review of the station's current procedure and revision of the governing instruction, as appropriate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The licensed operator was verified medically qualified by a physician on February 12, 1998, and full compliance with 10 CFR 55.27 was achieved.