

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dresden Road  
Morris, IL 60450  
Tel 815-942-2920



May 18, 1998

JMHLTR: #98-0143

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 50-237/249/98013  
NRC Docket Numbers 50-237 and 50-249

Reference: (a) G. E. Grant letter to O. D. Kingsley, dated April 16, 1998,  
transmitting NRC Inspection Report 50-237/249/98013 and Notice of  
Violation

(b) G. E. Grant letter to O. D. Kingsley, dated March 4, 1998, transmitting  
NRC Inspection Report 50-237/249/98006

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted by reference (a). The violation was for the failure to promptly identify and correct the potential to bypass the containment pressure suppression function. The response to the Notice of Violation appears in the attachment.

Dresden is committing to the following actions:

1. The Regulatory Assurance Manager will develop an action plan to address how to provide resolution to concerns raised by NRC officials at Dresden. The action plan should include methods that are formalized to document, track, and respond to concern(s) raised by a regulator. All actions required by the action plan are to be implemented in 1998.
2. The Dresden Quality and Safety Assessment Operating Experience (OPEX) Coordinator will coordinate with the Corporate OPEX Coordinator to revise NSWP-A-06 which is currently being reviewed as a Corporate (OPEX) initiative. This action is to also ensure that NOD OA.26 is incorporated into this revision. The purpose for this is to ensure PIFs that result in LERs are reviewed as OPEX documents and verified for applicability at all ComEd Nuclear Stations.

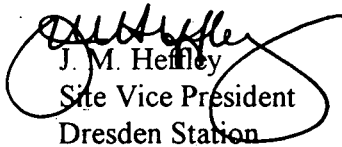
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3. The Curriculum Review Committee will review the recommendation to develop plant scenarios for all Licensed Operators that would specifically focus and challenge them on reportability requirements. This module should be part of the initial and continuing training. Regulatory Assurance personnel who communicate with the Shift regarding reportability should also be part of the required attendance for this training module once it is developed and implemented.

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**  
**50-237/98013, 50-249/98013**  
**98013-02**

**VIOLATION:**

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", states, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, deviations, defective materials and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, from February 21 to April 10, 1997, the licensee failed to promptly establish corrective actions to preclude bypassing the drywell to torus pressure suppression function, a condition adverse to quality, after receiving notification of a related issue on February 21, 1997, from LaSalle nuclear power plant. Specifically, corrective actions to preclude bypassing the containment pressure suppression system were not timely in that the licensee bypassed the pressure suppression function while deinerting the Unit 3 torus on March 28, 1997, with the reactor at power. In addition, on April 10, 1997, the licensee planned and subsequently postponed the deinerting of the Unit 2 containment, at power, with the drywell connected to the torus atmosphere after discussions with the NRC revealed that this activity would bypass the pressure suppression function.

**REASON FOR VIOLATION:**

This event was initially described in reference (b). As a result, on March 18, 1998, ComEd presented information during an open Predecisional Enforcement Conference regarding the issues identified in the inspection report. In preparation for the enforcement conference, Dresden Station performed a root cause analysis (NTS 237-230-98-00100) to identify the cause of the event and determine appropriate corrective measures. As a result of this investigation, the following root causes were identified:

1. A lack of personal ownership and Management Oversight as the result of a deficiency in the methods used to process information regarding operating experience from other ComEd sites.

2. At the time this condition was identified, plant personnel did not fully understand the issue. Initially, the plant's investigation focused on the potential to overpressurize SBGT. There were several opportunities during the onset of this event which could have resulted in clarification of the issue. However, there was a lack of a questioning attitude to clarify and confirm the plant's understanding of the issues. Even though discussions were held, the potential to bypass the containment pressure suppression function was not clearly identified.
3. Initially, there was no Problem Identification Form initiated to track this item. Therefore, no one was assigned ownership of the issue to ensure appropriate actions were being taken to resolve the issue. Clearly, this resulted in a delay in proper resolution of the issue.

**CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED:**

Identified plant operating procedures were revised to prevent containment vent alignments which would bypass the containment pressure suppression function.

The Site Vice President communicated expectations to station personnel regarding appropriate problem follow-up.

Engineering personnel were trained emphasizing engineering expectation and the threshold for initiating deficiencies documents.

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:**

As a result of the root cause analysis performed by Dresden Station, the following corrective actions to prevent recurrence have been initiated:

1. Dresden Operating Procedures 1600-01, 1600-05, 1600-07, 1600-18 were revised to clearly reflect the changes made to resolve the Suppression Pool Bypass Issue as specified in Dresden LER 50-237-97-011 as NRC Commitments.

2. The Regulatory Assurance Manager will develop an action plan to address how to resolve concerns raised by NRC officials at Dresden Station. The action plan should include methods to document, track, and respond to concern(s) raised by a regulator and all actions are to be implemented in 1998.  
(NTS 237-230-98-00104)
3. The Dresden Quality and Safety Assessment OPEX Coordinator will coordinate with the Corporate OPEX Coordinator to revise NSWP-A-06 which is currently being reviewed as a Corporate (OPEX) initiative. This action is to also ensure that NOD OA.26 is incorporated into this revision. The purpose for this is to ensure PIFs that result in LERs are reviewed as OPEX documents and verified for applicability at all ComEd Nuclear Stations.  
(NTS 237-230-98-00108)
4. The Curriculum Review Committee will review the recommendation to develop plant scenarios for all Licensed Operators that would specifically focus and challenge them on reportability requirements. This module should be part of the initial and continuing training. Regulatory Assurance personnel who communicate with the Shift regarding reportability should also be part of the required attendance for this training module once it is developed and implemented. (NTS 237-230-98-00110)

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Partial compliance was achieved with the revision of the operating procedures.

Full compliance is expected to be achieved by December 31, 1998 when all actions are completed.