

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



June 9, 1998

JMHLTR: #98-0167

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 50-237/249/98009
NRC Docket Numbers 50-237 and 50-249

Reference: (a) G. E. Grant letter to O. D. Kingsley, dated May 3, 1998, transmitting
NRC Inspection Report 50-237/249/98009 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted by reference (a). Two violations were identified during this inspection. They were 1) the failure to follow procedures in the area of fire protection, and 2) the failure to identify and correct a condition adverse to quality. The response to the Notice of Violation appears in the attachments.

Dresden is committing to the following actions:

1. Dresden Station will revise procedures DFPP 4175-01, "Fire Barrier Integrity and Maintenance," and DFPP 4100-03, "Fire Watch Procedure," to require the Work Execution Center (WEC) or Unit Supervisor to be contacted for all Fire Barrier issues. This will be completed by September 1, 1998.
(NTS # 237-100-98-00904-01)
2. Training request 98-792 has been generated to address training issues related to radiation protection technicians recognizing and reporting conditions adverse to quality. This will be evaluated by the Radiation Protection Curriculum Review Committee. This will be completed by July 31, 1998.
(NTS # 237-100-98-0090501B)

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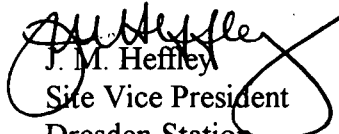
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This response contains no proprietary or safeguards information. If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920 extension 3800.

Sincerely,


J. M. Heffley
Site Vice President
Dresden Station

Attachment

cc: 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 1
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/98009, 50-249/98009
98009-04

VIOLATION:

Dresden Station 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 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, references Plant Fire Protection Program procedures.

Dresden Fire Protection Procedures (DFPPs) 4100-03, "Fire Watch Procedure," and 4175-01, "Fire Barrier Integrity and Maintenance," required that, "All fire watches established onsite shall be administratively controlled by the Operations Department Work Execution Center (WEC). Concurrence of the Safety and Property Loss Prevention (S&PLP) supervisor **MUST** be received prior to establishing OR terminating any fire watch."

Contrary to the above, on March 5, 1998, NRC inspectors identified the licensee established a fire watch and failed to contact the Work Execution Center and Safety and Property Loss Prevention supervisor before blocking open a fire door.

REASON FOR VIOLATION:

The requirement stated in the Notice of Violation addressing the administrative control of the fire watches established onsite by the Operations Department and concurrence of the S&PLP Supervisor is from the Precautions section of DFPP 4100-03, "Fire Watch Procedure." A review of the applicable procedures was performed and the results are as follows:

DFPP 4100-03, Step D.1 states:

"Fire watches associated with fire barrier components (including fire doors, fire dampers, electrical/mechanical penetration seals, and boundary materials) shall be established in accordance with DFPP 4175-1, "Fire Barrier Integrity and Maintenance." Fire watches **MUST** be maintained until the affected component is operable and has been inspected satisfactorily."

DFPP 4175-1, Step H.1.d (2) states:

“If any work activity involves the breaching of a fire door the S&PLP Supervisor MUST be contacted prior to the start of the activity. A fire watch per DATR 3/4.1.6, “Fire Rated Assemblies,” will be required if the fire door in question is associated with equipment that is required to be operable under the current plant status.”

In accordance with current procedural requirements, notification to the S&PLP Supervisor is required and can be as simple as a phone call. A review of this event revealed that the Maintenance Foreman made this notification by phone. At this time, the S&PLP Supervisor determined the requirements of the fire watch. In many cases, as in these examples, the S&PLP Supervisor may opt to include a new fire watch within the scope of an existing fire watch if the work to be performed will be completed prior to the existing fire watch being cancelled. Per procedure this does not require any formal documentation.

The requirement for the S&PLP Supervisor to formally notify the Unit Supervisor or the WEC, as required by the precaution statement, is not identified in the body of the applicable procedures. As a result, regardless of the decision of whether or not to initiate a new fire watch, as in this case, the formal notification not being part of the body of the procedure resulted in the procedural noncompliance that occurred.

The referenced fire watch that was in place for other work going on was done so in accordance with DHP 0230-01, “Control of Hot Work.”

CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED:

As a result of this event, the following actions were taken:

1. PIF was generated for documenting and trending purposes.
2. The existing fire watch for other work in the area served as the fire watch for the door that was propped open.
3. The Fire door was inspected and found to be operable as is required per DATR 3/4.1.6.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

The S&PLP Supervisors and the Valve Maintenance Supervisors have been counseled on the importance of notifying the WEC when breaching a fire door to initiate a fire watch.

Dresden Station will revise procedures DFPP 4175-01, "Fire Barrier Integrity and Maintenance," and DFPP 4100-03, "Fire Watch Procedure," to require the WEC or Unit Supervisor to be contacted for all Fire Barrier issues. This will be completed by September 1, 1998. (NTS # 237-100-98-00904-01)

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on March 6, 1996 when the WEC was made aware of the fire watch.

ATTACHMENT 2
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/98009, 50-249/98009
98009-05

VIOLATION:

Criterion XVI, "Corrective Actions," of Appendix B to 10 CFR Part 50 required that measures shall be established to ensure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are promptly identified and corrected.

Contrary to the above, on March 23, 1998, during a tour of the Unit 2 drywell, NRC inspectors identified conditions adverse to quality that had not been promptly addressed or corrected by licensee personnel until prompted by inspector's questioning. The adverse conditions involved a steady stream of water running down the radiological shield wall and splashing onto electrical cable trays and onto personnel working inside the drywell.

REASON FOR VIOLATION:

Drywell personnel failed to adequately respond to a condition that could have adversely affected equipment and lead to personnel contamination events. This was a result of a lack of attention to detail and failure to maintain standards by Radiation Protection personnel assigned to the drywell.

CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED:

The identified leak was a result of valve packing leakage from the 2-2301-4, Unit 2 HPCI Turbine Steam Inlet Inboard Isolation MOV, valve that is located on the fourth floor of the drywell. The leak was identified initially by Radiation Protection personnel on March 11, 1998 at 2205 hours. Upon confirmation of the leak and notification to operations, the leak was contained through installation of a catch basin and drain assembly at 2355 hours on March 11, 1998.

The leak from the valve appeared to be controlled at that time, but on March 19, 1998 at 0050 hours, leakage was again identified. Upon investigation it was determined that the origin of the leak was the 2-2301-4 valve packing via system piping. This was due to the configuration of the piping (horizontal run) and the existence of metallic reflective insulation (MRI) on the piping. Ultimately the leaking water was following the piping under the MRI to a location near the drywell penetration and then dripping to areas below. Subsequently, a second catch basin and drain assembly was installed.

Again at 0540 hours on March 23, 1998, a leak was identified coming from a penetration on the 4th floor of the drywell. The Operations department was notified and, at 0605 hours, operations personnel investigated the origin of the leak. It was confirmed that the water had originated at the 2-2301-4 valve and followed the piping all the way to the penetration. Subsequently, a third catch basin was installed at 0700 hours on March 23, 1998.

At 1354 hours on March 23, 1998, three (3) NRC inspectors entered the drywell for a tour and identified water leaking from an unidentified source above the first floor of the drywell. The inspectors notified a Radiation Protection technician. The technician was not immediately aware of the origin of the leak and informed operations so a determination could be made. Upon confirmation that the water was another diversion from the 2-2301-4 valve, a fourth catch basin was installed.

An action request was generated to repack the 2-2301-4 valve on March 26, 1998 and the valve was successfully repacked on its backseat later that day per Work Request #980031707-01.

A Problem Identification Form (PIF) (D1998-02358) was generated on March 31, 1998 to capture and resolve potential damage to equipment. A follow-up inspection performed on April 1, 1998 revealed no evidence of damage.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

Training request 98-792 has been generated to address training issues related to radiation protection technicians recognizing and reporting conditions adverse to quality. This will be evaluated by the Radiation Protection Curriculum Review Committee. This will be completed by July 31, 1998.
(NTS # 237-100-98-0090501B)

Radiation Protection personnel assigned to the drywell were counseled regarding the expectations for identification and control of leakage.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on March 26, 1998 when the valve packing was repaired.

bcc: F. Spangenberg, Regulatory Assurance Manager
C. Peterson, Regulatory Affairs Manager, Quad Cities Station
D. Ambler, Acting Regulatory Assurance Supervisor
A. Fuhs, Nuclear Licensing Administrator
S. Barrett, Operations Manager
R. Freeman, Site Engineering Manager
S. Kuczynski, Shift Technical Supervisor
L. Weir, Design Engineering Supervisor
P. Planning, Systems Engineering Supervisor
D. Zehrung, Operations Staff Supervisor
DCD, Licensing, hard copy
DCD, Licensing, electronic copy
Dresden Regulatory Assurance, Chron File
Dresden Regulatory Assurance, Subject File
SALP 16 file
Numerical file