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October 7, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Response to an Item of Concern
Relative to Holes Found in a
Bellows Assembly
NRC Docket No. 50-237

Reference (a): D. G. Eisenhut letter to D. L. Farrar
dated September 7, 1983.

Dear Mr. Denton:

Attached is Commonwealth Edison's response to an item of concern identified in Reference (a) which transmitted the confirmation of exemption from requirements of Appendix J to 10 CFR 50, Section IV.A.

Attachment A to this letter discusses our assessment of the case and the corrective actions taken.

If there are any questions regarding this matter, please contact this office.

One signed original and forty (40) copies of this letter is provided for your use.

Very truly yours,

B. Rybak
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - Dresden

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO AN ITEM OF CONCERN

During normal Unit 2 operation (759 MWe) on July 19, 1983, at approximately 1525 hours, a 1/8 inch by 1/16 inch hole was discovered in the expansion bellows on the torus to drywell vacuum breaker line for vacuum breakers 2-1601-32A and B. The hole was believed to be caused by an arc strike associated with the welding operation for the installation of IE Bulletin #79-14 Hanger/Mark I Torus Attached Piping Modifications. Because of very limited access, the protective metal shroud surrounding the bellows had to be removed in order for the welder to complete the required welding in accordance with hanger design and modification package.

A repair program was prepared and approved by the station. The hole was filled to the original section thickness and the surface was buffed to remove stress risers. The repair examined by visual and liquid penetrant methods. In addition, the entire vacuum breaker line including the repaired area was air tested for leaks. All tests were successfully completed.

Following the July 19th event, corrective action required that exposed bellows be protected by covering the bellows with a fire-proof material. This corrective action was carried out through verbal instruction from contractor supervisory personnel to craft personnel.

In addition, Station Construction management conducted a review of each job and conducted job site walkdowns of work in progress to inform contractor management personnel of systems and components within a given work area which impact on plant safety, such that additional precautions to working personnel can be issued.

On August 11, 1983, during normal Unit 2 operation (795 MWe), two holes were discovered on the expansion bellows in the torus to drywell vacuum breaker line that contains vacuum breakers 2-1601-33C & D (.05 inches diameter and .03 and .08 inches rectangular in shape) and another discovered on the line that contains vacuum breaker 2-1601-33E & F (.04 inches diameter).

An investigation revealed that construction work in the vicinity of the two vacuum breaker lines started on July 27, 1983 and during this occurrence the corrective actions described above were in effect. However, the protective fire-proof covering was draped over the bellows leaving a portion of the lower half unprotected. This is the area where the three (3) holes were located. It is believed that the arc strikes were accidental in nature and possibly due to a cable short in a temporary (125 VAC) lighting string.

The corrective action to restore Unit 2 to service involved the same bellows repair procedure by qualified welding specialist and engineering analysis by qualified personnel as was used for the first event on July 19, 1983. The unit was restored to service on August 12, 1983, after successful weld repair of the bellows and testing program.

Because of this second event, immediate action was taken by the station management personnel to stop all contractor activities in the torus area and specifically any work in the vicinity of vacuum breaker bellows. This stop work order was to remain in effect until a more effective corrective action plan and procedures to prevent recurrence were presented by Station Construction Department site personnel to the station for review and approval. The prime corrective action parameters were to include regular and timely surveillance and monitoring of contractor activities (at least four (4) times per day) by Commonwealth Edison Company Site Station Construction Department (SCD) personnel in all areas.

Station Construction Department management actions initiated as a result of this second event included the following:

1. Meeting with station personnel to review the two events of bellows damage and review the corrective action plans necessary to preclude future problems.
2. Notifying site contractor management that contractor personnel interviews are to be scheduled in an effort to ascertain status of corrective action for the July 19, 1983 event, cause of second event, and input for corrective action to prevent future events.
3. Review of these events and associated problems with Dresden Site SCD personnel to reinstruct them in their responsibilities for contractor performance and their liason with station personnel.
4. Meeting with contractor home office management for review of their responsibilities with special emphasis on the need to adhere to rules and practices preventing occurrence of all events which could affect an operating station performance.
5. Developing an overall plan to meet with all contractors performing activities which are directed by Station Construction at operating nuclear generating station sites to emphasize the need for controls to prevent occurence of the Dresden Unit 2 type events.

The actions described have been completed and the results are as follows:

1. Station Construction Department management met with Dresden Station management on August 16, 1983, for a complete review of corrective actions and station concerns. As a result of this meeting, Station

Construction Department agreed to institute more positive control of contractor activities and review the need for procedural changes. A station traveler was included in the modification package which required the following:

- a. Remove all electrical equipment from the area prior to the bellows shroud removal.
 - b. Remove all bellows covers and inspect bellows.
 - c. Install two layers of fire-proof fabric around the bellows. The fabric is to be banded at both ends (Q.C. and Q.A. inspection required).
 - d. Contractor shall inspect his electrical equipment for ground faults.
 - e. No bellows shroud covers will be removed by the contractor without Station Construction approval. Fire blankets will at no time be removed. SCD will monitor all bellows which have shroud covers removed four (4) times per day (Q.C. inspection is also required).
2. Contractor personnel interviews were conducted by SCD management on August 15 and 16, 1983. Both occurrences were thoroughly reviewed as well as corrective actions.
 3. SCD upper management conducted discussions with Site SCD personnel to emphasize their responsibilities for contractor performance and corrective actions.
 4. A meeting with the contractor's home office management was held on August 18, 1983. The seriousness of these events were emphasized which included the potential dismissal of personnel if station requirements are not met. In addition, a meeting with contractor site supervisory personnel has been completed which emphasized the strong need for close attention to rules governing activities to prevent safety problems.
 5. A plan, to meet with all site contractors, is in development and will be carried out at the earliest point in time practicable.

In conclusion, independent visual inspections were conducted twice daily by Quality Control personnel. The work being conducted in the area of the bellows on Unit 2 has been completed as of September 28, 1983. The same work relative to Unit 3 will be completed during the current refueling outage and the same corrective actions implemented for Unit 2 on August 16, will also apply to Unit 3.