



Commonwealth Edison
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April 16, 1985

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Response to Items of Noncompliance
in I.E. Inspection Report Nos.
50-237/85-06 and 50-249/85-05

Reference: W. S. Little letter to Cordell Reed dated
March 19, 1985.

Dear Mr. Keppler:

The reference provided results of a routine safety inspection conducted by P. L. Eng of your office during the period of February 13 through February 26, 1985 of activities at Dresden Nuclear Power Station, Units 2 and 3.

During the course of that inspection, certain activities appeared to be in noncompliance with NRC requirements. Corrective action was taken on Item 2 during the inspection and, as noted in your letter, no response is required. Therefore, Attachment A to this letter contains our response to Items 1 and 3.

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

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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cc: NRC Resident Inspector - Dresden

APR 19 1985

Attachment

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PDR ADOCK 05000237
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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

ITEM 1

10 CFR 50.55(g) requires that licensees implement an inservice testing program for pumps and valves per the requirements of Section XI of the ASME Code unless specific relief has been granted by the Commission. Subsections IWV-3300 and Table IWF-3100-1 of Section XI of the ASME Code state that remote position indicators for all valves be verified once every two years to accurately reflect the status of the valve and that pump suction pressure be measured with the pump idle.

Contrary to the above, the accuracy of remote position indicators for accessible valves was not verified nor were pump suction pressures measured with the pumps idle. No request for relief from these requirements had been submitted to the Commission.

DISCUSSION

The accuracy of remote position indicators for all accessible valves was not verified once every two years as required by IWV-3300 of Section XI of the ASME Code, Summary 1979 Edition. In reviewing procedure DOS 040-7, it was found that the procedure governs inaccessible valves only and inadvertently had not been updated to include accessible valves when the ASME Code was revised. Also, the suction pressures for those pumps included in the IST program had not been measured when the pumps were idle as required by Table IWP-3100-1 of Section XI.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The corrective action to be taken to avoid further non-compliance is to incorporate accessible valves into DOS 040-7. This surveillance is performed during each respective unit's refueling outage and therefore will ensure that remote position indicators are verified once every two years to accurately reflect the status of accessible as well as inaccessible valves. DOS 040-7 will be revised by the next refueling outage for Units 2 and 3. This revision will ensure that DOS 040-7 is in complete conformance with the requirements of Subsection IWV-3300 of Section XI of the ASME Code.

Furthermore, calibrated pressure gauges will be used for test purposes on the suction lines of all pumps included in the in-service testing program. For those pumps in the IST program which have existing taps on the suction line, pressure gauges will be utilized by July 1, 1985. For those pumps which do not have existing taps on the suction line, provisions for calibrated pressure gauges will be installed during the respective units' next scheduled refueling outage.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved with the complete revision of DOS 040-7 at the next Unit 2 refueling outage.

ITEM 3

Criterion XVI of 10 CFR 50, Appendix B, as implemented by Commonwealth Edison Corporate Quality Assurance Manual, Chapter 16, states that methods shall be established to insure the timely identification of conditions adverse to quality. In addition, Section XI of the ASME Code, Subsection IWV-3413, requires that valves with stroke time increases in excess of stated percentage be tested at an increased frequency until corrective action has been taken.

Contrary to the above, the licensee failed to evaluate the valve stroke time data for all of 1984 on Unit 3.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The Dresden IST Coordinator has begun evaluating valve stroke time data obtained in procedures DOS-1600-1, "Quarterly Valve Timing", and DOS 1600-18, "Cold Shutdown Valve Testing" in accordance with the Section XI of the ASME Code Subsection IWV-3413. If any stroke time increases in excess of the stated percentages, the test frequency will be increased in accordance with IWV-3413.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Revisions to DOS 1600-1 and DOS 1600-18 will be made to incorporate an "IST Review" signature. This review will insure evaluation of valve stroke time data.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Procedures will be revised by July 1, 1985.