

Appendix

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Nuclear Power Station

Docket No. 50-237
Docket No. 50-249

As a result of a special inspection conducted during the period of February 16 through March 28, 1985 at the Dresden Nuclear Power Station, and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10 CFR Part 2, Appendix C), the following violations were identified:

1. Technical Specification 3.5.C.1 states in part that "the HPCI subsystem shall be operable whenever the reactor pressure is greater than 90 psig and irradiated fuel is in the reactor vessel."

Technical Specification Definition 1.0.0 defines Operability for a subsystem to include all auxiliary equipment that are required for the subsystem to perform its function(s), are also capable of performing their related support function(s).

Contrary to the above, on February 22, 1985, the service water to the High Pressure Coolant Injection (HPCI) System room cooler was found valved out. The licensee determined that this situation had existed for approximately 29 to 38 days. Therefore, this resulted in the room cooler, and by definition, HPCI, to be considered inoperable for that period of time. A technical evaluation conducted by a licensee contractor showed that the HPCI would be functional for a period of time sufficient to take alternative actions.

This is a Severity Level IV violation (Supplement I).

2. Technical Specification 3.7.2 states in part, that primary containment integrity shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212° and fuel is in the reactor vessel.

Contrary to the above, on March 2, 1985, the licensee found a torus water sample line open. This allowed for a direct flowpath for torus water from primary containment to secondary containment via the reactor building floor drain sump. It should be noted that this leakage path would still have been in existence during an accident situation and would have allowed for a calculated flow rate of approximately 40 gpm maximum, unless one loop of the core spray system was intentionally isolated to prevent it. The licensee subsequently determined that the valves had been open for a period of approximately five shifts.

This is a Severity Level IV violation (Supplement I).

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3. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings" requires that activities affecting quality shall be prescribed and accomplished by appropriate instructions, procedures, and drawings.

10 CFR 50 Appendix B, Criterion XIV, "Inspection Test and Operating Status", requires that measures be established for indicating the operating status of....systems and components of the nuclear power plant such as by tagging....to prevent inadvertent operation.

Commonwealth Edison Company, Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", implements 10 CFR Appendix B.

Dresden Operating Surveillance Procedure DOS 6600-5, "Bus Undervoltage and ECCS Integrated Functional Test for 2(3) Diesel Generator", Prerequisites, Step 13, calls for an equipment line up in accordance with the attached loading and Caution Card check lists.

Contrary to the above, while preparing to conduct Dresden Operating Surveillance, DOS 6600-5, "Bus Undervoltage and ECCS Integrated Functional Test for 2(3) Diesel Generator", on the Unit 2 emergency diesel generator on February 16, 1985, mislabeling and misapplication of the Caution Cards resulted in the removal of the ability of the Unit 3 low pressure emergency core cooling systems to respond under a loss of off site power condition if they had been called upon. The condition existed for about four and one half minutes while the Unit was at full power and it was recognized and corrected through the prompt response of control room management personnel. It is recognized that the low pressure emergency core cooling systems could have responded as designed as long as offsite power was available.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Apr 18 1985

Dated _____

C. E. Norelius

C. E. Norelius, Director
Division of Reactor Projects