



Commonwealth Edison

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May 20, 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 Item of Noncompliance
in I.E. Inspection Report Nos.
50-237485-10 and 50-249/85-09

Reference: C. E. Norelius letter to Cordell Reed
dated April 18, 1985.

Dear Mr. Norelius:

The reference provided results of a special safety inspection conducted by Messrs. S. Stasek, T. M. Tongue and C. D. Anderson of your office during the period of February 16 through March 28, 1985 of activities at the Dresden Nuclear Power Station.

During the course of that inspection, certain activities appeared to be in noncompliance with NRC requirements. Attachment A to this letter contains our response to the notice of violation.

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

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY
RESPONSE TO NOTICE OF VIOLATION

VIOLATION #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 1.0.0 defines Operability for a subsystem to include all auxiliary equipment that is 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.

Corrective Action Taken and Results Achieved

1. The affected Unit 3 HPCI valves were immediately returned to service. Similar valves were inspected on the Unit 2 HPCI room coolers, and on other ECCS room coolers from both units: LPCI/Core Spray room coolers and Containment Cooling Service Water Vault Coolers (CCSW). No valve misalignments were found.
2. All associated service water supply valves to HPCI room coolers, LPCI room coolers and CCSW vault coolers were locked open in March 1985. Temporary procedure changes were written for the following Dresden Operating Procedures (DOP's) to reflect the existence of the locks:

DOP 040-M2	Locked Valve List, Unit 2
DOP 040-M1	Locked Valve List, Unit 3
DOP 040-M3	Locked Valve List During Operation, Unit 2
DOP 040-M4	Locked Valve List During Operation, Unit 3
DOP 1500-M1	LPCI and Containment Cooling, Unit 2 and 3
DOP 2300-M1/E1	HPCI Checklist, Unit 2 and 3

Temporary procedure changes were written for the following DOS procedures to include a verification of room cooler operability:

DOS 1500-3	Containment Cooling Service Water Pump Test, Unit 2 and 3
DOS 1500-6	LPCI System Pump Operability Test with Torus Available, Unit 2 and 3
DOS 2300-3	HPCI System Pump Test, Unit 2 and 3

3. Tailgate sessions were held in March 1985 with all departments re-emphasizing the importance of contacting operating supervision prior to any valve manipulations.
4. Sargent & Lundy conducted an analysis of the HPCI room heat balance without the benefit of the room cooler. This computer model with conservative assumptions showed that the temperature build up in the room was slow enough to provide a significant period of time where the HPCI was still functional and alternate actions could have been taken.
5. The event and above actions were discussed during the six week operator retraining program completed May 9, 1985.

Corrective Action to be Taken to Avoid Further Non-Compliance

1. Permanent procedure changes for the above locked valve and system valve checklists with the addition of DOP 3900-M1, "Service Water and Screen Wash Checklist", and DOP 3900-M2, "Emergency Room Coolers Valve Checklist", will be initiated to reflect the existence of the locks.
2. Permanent procedure changes for the above operating surveillances will be initiated to include a verification of room cooler operability.

Date When Full Compliance Will Be Achieved

All permanent procedure changes will be completed by July 31, 1985.

VIOLATION #2

Technical Specification 3.7.A.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 flow path 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.

Corrective Action Taken and Results Achieved

1. The first isolation valve on the torus water sample line for both Units 2 and 3 was locked closed in March 1985. Temporary procedure changes were written for the following procedures to reflect the existence of the locks:

DOP 040-M2	Locked Valve List, Unit 2
DOP 040-M1	Locked Valve List, Unit 3
DOP 040-M3	Locked Valve List During Operation, Unit 2
DOP 040-M4	Locked Valve List During Operation, Unit 3
DOP 1600-M1/E1	Pressure Suppression System Checklists, Unit 2
DOP 1400-M2	ECCS Fill Systems, Unit 2 and 3

2. Accessible portions of ECCS Systems were walked down in March 1985 on both units. No similar problem areas were identified.
3. The event was discussed with the RCTs and was discussed at the station tailgate sessions in April 1985.

Corrective Action to be Taken to Avoid Further Non-Compliance

1. Permanent procedure changes for the above locked valve and system valve checklists will be initiated to reflect the existence of the locks.
2. Accessible portions of ECCS systems were walked down to determine if other locations existed with unlocked valves that could constitute a potential violation of primary containment integrity. The results of this walkdown will be reviewed with the Operating Department and appropriate procedures will be revised.

3. A procedure change will be written to DCP 1600-9, Unit 2 Torus Water Drain Sampling, and DCP 1600-10, Unit 3 Torus Water Sample Procedures. The change will require that an operator is present to unlock and open the required valves to obtain the sample and close and lock the required valves after the sample is obtained.

Date When Full Compliance Will Be Achieved

All permanent procedure changes will be completed by July 31, 1985.

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VIOLATION #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 lineup in accordance with the attached loading and Caution Card checklists.

Contrary to the above, while preparing the 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 core cooling systems to respond under a loss of off-site power 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 off-site power was available.

Corrective Action Taken and Results Achieved

1. An Operating Order was issued on March 26, 1985 to require that all personnel involved with a test or complex plant evaluation will discuss the activity in detail "face to face", before proceeding with the activity.
2. The event was discussed at the station tailgate sessions in March 1985.

Corrective Action to be Taken to Avoid Further Noncompliance

1. Rewrote DOS 6600-5 and 6600-6 into separate procedures for Unit 2 and 3.

2. Placed in the prerequisite of DOS 6600-5 and 6600-6 a signoff sheet that requires all three diesel generators to be operable prior to performing the surveillance. Also place in the prerequisite a requirement to schedule manpower such that at most only two specific personnel will be in charge of the test to ensure better continuity and communication.
3. Preprinted caution card checklists will be included in the ECCS undervoltage test procedures to ensure that an accurate description of the undervoltage knife switches is included.
4. A review of this event will be held with all Operating personnel during the six-week operator retraining.
5. A Pro investigation will be initiated on this event.

Date When Full Compliance Will Be Achieved

The procedure changes noted in Items 1, 2, and 3 above will be completed for both units by the next respective refueling outages. The remaining actions will be completed by August 31, 1985.

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