



Commonwealth Edison

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Address Reply to: Post Office Box 767
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July 18, 1985

Mr. J. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL. 60137

Subject: Dresden Station Unit 2
Supplemental Response to
Inspection Report No. 50-237/85-016
NRC Docket No. 50-237

References (a): J. J. Harrison letter to Cordell Reed
dated June 6, 1985

(b): D. L. Farrar letter to J.G. Keppler
dated July 5, 1985

Dear Mr. Keppler:

Reference (a) transmitted an inspection report regarding an inspection conducted by Ms. P.R. Rescheske on April 11 through May 3, 1985 of activities at Dresden Station Unit 2. Reference (b) transmitted our response to the identified activities that appeared to be in noncompliance with NRC requirements. In subsequent telecons with Mr. M. Ring on July 12 and Mr. R. Landsbury on July 16 it was agreed that portions of our response would be supplemented or revised. The Commonwealth Edison supplemental response to the Notice of Violation is provided in the enclosure. This response totally supersedes Reference (b).

If you have any further questions regarding this matter, please direct them to this office.

Very truly yours,

M.S. Jurbak
for D. L. Farrar
Director of Nuclear Licensing

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cc: NRC Resident Inspector
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ATTACHMENT

COMMONWEALTH EDISON COMPANY RESPONSE TO

NOTICE OF VIOLATION

As a result of the inspection conducted on April 11 through May 3, 1985, the NRC identified the following violations:

ITEM 1: Technical Specification 6.2.A requires in part that written procedures shall be prepared, approved, and adhered to concerning normal startup, surveillance, and testing activities.

- a) Procedure DIP 700-16, "LPRM Amplifier Gain Calibration," requires that the past current level be verified and checked off on the data sheet.

Contrary to the above, on April 18 and May 1, 1985, the licensee failed to check off the past current level column on the LPRM Calibration Data computer printout (data sheets).

Corrective Action Taken and Results Achieved

The Master Instrument Mechanic held discussions with his personnel to emphasize the importance of recording their verification of the past LPRM calibration current on the computer data sheet.

Corrective Action to be Taken to Avoid Further Non-Compliance

A revision to the computer program that generates the data sheets has been initiated. The format of the data sheets will be improved to provide a clearer checkoff space.

Date When Full Compliance Will Be Achieved

The above computer revision will be completed by September 1, 1985.

- b) Procedure DTS 8233, "TIP System Calibration," requires a sample of both "B" and "C" level calibrated LPRM readings be recorded and used in the calculation to determine the desired currents for each TIP amplifier.

Contrary to the above, on April 17, 1985, the licensee recorded only one of the LPRM level readings, and not both "B" and "C" levels as specified in the procedure.

Corrective Action Taken and Results Achieved

A review of this event revealed that the appropriate data has been properly collected. However, due to the lack of separate boxes for recording the "B" and "C" level readings on the data checklist, the Nuclear Engineer recorded the average of the "B" and "C" level readings. Thus the use of these values resulted in the same TIP calibration constants as would have been calculated if individual "B" and "C" level readings had been used. Therefore, there was no effect on the calibration of the TIP Amplifiers.

Corrective Action to be Taken to Avoid Further Non-Compliance

A procedure revision will be implemented to better reflect the desired calibration process.

Date When Full Compliance Will Be Achieved

This revision will be completed on October 1, 1985.

- c) Procedure DOS 300-4, "Control Rod Drive Timing," requires that the drive time shall be adjusted to 48 seconds $\pm 10.0\%$ and then retimed.

Contrary to the above, on April 5, 1985, the licensee failed to adjust and retime the drive at location G-11 (26-43), which had a total insertion time of 43.15 seconds.

Corrective Action Taken and Results Achieved

We have reviewed this procedure and consider accuracy of control rod timing to be to the first decimal point. Accordingly, the computer program was in error for providing unnecessary precision to two decimal points in the timing of the control rods.

Corrective Action to be Taken to Avoid Further Non-Compliance

A computer program revision will be performed which will edit control rod drive times to one decimal place.

Date When Full Compliance Will Be Achieved

The computer revision will be implemented by October 1, 1985.

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ITEM 2: 10 CFR 50, Appendix B, Criterion II, as implemented by the CECO Quality Assurance Manual, states in part that the quality assurance program shall be documented by written procedures and shall be carried out in accordance with those procedures. Quality Procedure QP No. 17-51 prohibits the use of white-out, correction tape, scribbling out information, and marking over data for making changes/corrections to quality documents.

Contrary to the above, a number of records were found in which data had been scribbled out, marked over, and modified with the use of correction tape. Specific examples were found in licensee records for procedures DTS 8138, DTS 8135, and DOS 300-4.

Corrective Action Taken and Results Achieved

Violation of Q.P. No. 17-51 was identified in Section 2.C of Inspection Report Nos. 50-237/85-08 and 50-249/85-07 dated May 8, 1985. Corrective actions were identified and taken in response to that Inspection Report. The corrective actions included discussing the need for attention to detail and proper documentation at the next operating and maintenance management meetings. Also, a letter was distributed from the station manager to all personnel stressing the need for all work groups to increase their effort to pay more attention to detail as described in Q.P. No. 17-51 and other station procedures. In addition, the letter was to serve as a topic for work group discussions for all station personnel. Furthermore, Quality Control personnel were reinstructed to specifically look for problems in these areas.

Correction Action Taken to Avoid Further Non-Compliance

No additional corrective actions are necessary.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.