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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

July 26, 1985

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

Subject: Dresden Station Units 2 and 3
Supplemental Response to Generic Letter
No. 83-28, "Required Actions Based on
Generic Implications of Salem ATWS Events"
NRC Docket Nos. 50-237/249

References (a): Generic Letter No. 83-28 D. G. Eisenhut
letter to all OLS and CPS dated July 8, 1983
(NL-83-0003)

(b): J. A. Zwolinski to D. L. Farrar letter dated
April 29, 1985

Dear Mr. Denton:

Reference (b) contained a request for additional
information pertaining to Items 2.1, 2.2.2, and 4.5.3 of Generic
Letter 83-28. Attached are the responses to the items covered by
the request.

Enclosed for your use are fifteen copies of the letter and
attachment. Please address any questions that you or your staff may
have concerning our response to Generic Letter No. 83-28 to this
office.

Respectfully,

G. L. Alexander
Nuclear Licensing Administrator

bs

Attachment

cc: US NRC, Document Control Desk
Washington DC 20555

R. A. Gilbert - ORB5
J. G. Keppler - RIII
RIII Inspectors - D

0410K

A055
1/15

Attachment 1
Dresden Station
Units 2 and 3

Item 2.1

Licensee needs to submit detailed information describing his vendor interface program for reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current and controlled throughout the life of the plant and should also indicate how the program will be implemented at Dresden 2, 3.

Response

This item requests information describing the program used at Dresden Station assuring that vendor technical information is kept current, complete, and controlled throughout the life of the plant. In order to comply with this commitment, the Station has revised Administrative Procedure DAP 2-10 (Control of Vendor Equipment Technical Information). A copy of the revised procedure is attached for your review.

Item 2.2.2

Licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at Dresden 2, 3. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of item 2.2.2 concern.

Response

CECo has been informed through INPO that the March, 1984 NUTAC document is acceptable to the NRC. Therefore, this letter does expand on previous responses. CECO used the NUTAC report in developing the Nuclear Stations Division Directive and the Dresden Station procedures.

Item 4.5.3

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present proposed technical specification changes for staff review.

The staff has just received the BWR Owners Group response to Item 4.5.3 (NEDC-30844). If the licensee intends to formally endorse the Owners Group response, the licensee should delay his plant-specific response to Item 4.5.3 until after the staff completes their review of the Owners Group response.

Response

This item addresses an NRC concern that the Technical Specifications be revised to include testing of the backup scram valves at a frequency of once per refueling outage. Dresden Station does not feel that such a Technical Specification change is necessary. The backup scram valves are currently tested once per refueling outage while performing DOS 500-7, Scram Auxiliary Functions Test. This surveillance is performed during each refueling outage in order to satisfy Technical Specification surveillance requirements listed in Table 4.1.1 and 4.3.A.3. Backup scram valve testing includes operator verification that both backup scram valves operates and vent air to atmosphere.

A second item of NRC concern is directed towards the testing of the scram pilot valves (including all initiating circuitry). This pertains to the review of the existing intervals for on-line testing considering the concerns of Sub-Items 4.5.3.1 to 4.5.3.5 of the Generic Letter. From the G.E. study NEDC-351P (Technical Specifications Improvement Analyses for BWR Reactor Protection System), G.E. concludes that the current testing of the pilot valves is considered adequate. The Station Management personnel also believe that the present testing requirements are adequate. However, present review of the G.E. proposal (NEDC-30815P) is being conducted by Station personnel and awaits final approval. The Station is also reviewing the BWR Owners Group response to Item 4.5.3 (NEDC 30844) in conjunction with NEDC-30815P and is waiting for a completed response for the plant-specific response before any decisions on the above proposal are made. We will followup on this item as soon as our review is complete.

DAP 2-10
Revision 1

CONTROL OF VENDOR EQUIPMENT TECHNICAL INFORMATION

A. SCOPE

1. The purpose of this procedure is to explain the processes used to control vendor equipment technical information received for use at Dresden Nuclear Power Station (DNPS).
2. Equipment technical information may apply to either safety-related equipment or to significant non-safety-related equipment, as determined by the station in accordance with this procedure, Technical Specifications, Final Safety Analysis Report, and other criteria.

B. DEFINITIONS

1. Controlled Copy - A document whose contents cannot be changed without a review procedure as described in this procedure.
2. ETI - Equipment Technical Information, supplied by either a Vendor of purchased Safety-Related or Non-Safety-Related Equipment, or from some other agency (such as a regulatory body).
3. NPRDS - Nuclear Plant Reliability Data System: a nationwide computerized nuclear industry data base used for failure reporting and reliability checks on systems and equipment. Here at DNPS, the data base contains a listing of Safety-Related and SIGNIFICANT Non-Safety-Related Equipment in Units 2 and 3.
4. Nuclear Network - A nationwide computerized Information Service whereby general information concerning Nuclear Station Operations may be relayed to all Operating Nuclear Power Plants.

C. POLICY AND METHODS

Vendor ETI shall be controlled by the station in accordance with its particular designation: ETI presently in possession of the station as of the date of initial approval of this procedure, incoming ETI, and outgoing ETI.

1. ETI Presently In Possession of the Station

Control of Vendor ETI Documents shall occur when a station procedure directs the use of Vendor ETI Documents or when a Department Head or his designate authorizes control of a Vendor ETI Document.

DAP 2-10
Revision 1ResponsibilityAction

a. Cognizant Department.

- (1) Review current Vendor ETI and determine applicability to the Station, using one or more of the following criteria:
 - (a) The ETI has safety-related applications.
 - (b) The ETI has significant non-safety-related applications.
 - (c) The ETI contains no significant errors or omissions.
 - (d) The ETI reflects the AS BUILT condition of the equipment.
- (2) If determined applicable, assemble one temporary master copy, including known Station-Generated Notes and other additions based on such criteria as current operations, and procedural requirements. Forward master ETI to Central File with duplication and register requirements.
- (3) If unable to determine applicability, solicit and document concurrence of the equipment supplier in order to resolve or confirm significant issues regarding technical content and warranties. If the concurrence of the equipment supplier cannot be obtained, the reasons for the lack of concurrence shall also be documented. Forward master ETI to Central File with duplication and register requirements, along with above vendor contact documentation.

DAP 2-10
Revision 1Responsibility

- a. Cognizant Department
(Cont'd).

NOTE

The ETI shall receive Initial Control Status when it has been determined by cognizant station personnel to be complete and applicable to station procedures and equipment. The ETI Document which has received initial control status shall also reflect all appropriate and applicable changes subsequent to the date of initial control.

This determination shall be based upon the available knowledge and information of one or more station personnel as deemed appropriate by the cognizant station department head.

When significant technical changes to controlled vendor ETI documents are made by department personnel, such changes shall be reflected in all master and controlled copies. Significant changes shall also be reflected in all applicable station procedures affecting the department; it is the department's responsibility to modify their procedures using DAP 9-2, Procedure Preparation and DAP 9-3, Procedure Review and Writing.

- (4) ETI documents affected by station modifications shall be updated to reflect the AS-BUILT condition of the equipment. If significant ETI document changes occur, such changes shall be reflected in all master and controlled copies of ETI documents. Follow Steps C.1.a.(1), (2) and (3) above.

DAP 2-10
Revision 1ResponsibilityActiona. Cognizant Department.
(Cont'd)

- (5) Perform procedure review of all pertinent procedures, based on finalized version of ETI approved by the department.
- (6) Change procedures as appropriate.

NOTE

- (1) A Vendor ETI Document should not be used in place of procedures, but rather as a verified reference for procedure development, trouble-shooting, or as part of a procedure which clearly defines those Vendor ETI or portions thereof which are to be used in performing the procedure.
- (2) If uncontrolled ETI Documents are directed to be used by a Station Procedure, then those uncontrolled ETI Documents shall be controlled in accordance with Section C.1. of this procedure.

b. Central File Personnel.

- (1) For approved ETI, prepare Permanent Control Status copies according to the following distribution:
 - (a) Copy #1 - Central File Master
 - (b) Copy #2 - Central File User Copy.
 - (c) Subsequent copies - per department requirements.
- (2) Permanent control status copies shall be stamped or otherwise identified as to their register numbers.

DAP 2-10
Revision 1ResponsibilityActionb. Central File Personnel
(Cont'd).

- (3) Central File Copies of ETI shall be maintained in accordance with current Central File Records Storage Procedures.
- (4) Vendor correspondence and Review concurrence shall be maintained with the Master copy of the ETI.
- (5) An index shall be maintained for each ETI, listing registered copies and their assigned departmental locations.

2. Incoming ETI

Incoming ETI is initially controlled by DAP 2-1, Control of Station Correspondence.

Incoming ETI will be identified, in accordance with DAP 2-1, by the Office Supervisor or his Assistant and forwarded to the Technical Staff Supervisor for his concurrence.

If the Technical Staff Supervisor concurs, the ETI is then forwarded to Central File for processing.

a. Central File Personnel.

- (1) Forward one (1) copy of ETI to Cognizant Department using Form DAP 2-10B. The form must be signed by the Services Superintendent.
- (2) Retain other copies of the ETI until results of review are received.
- (3) Track status of the ETI using DAP Form 2-10A.
- (4) Retain copies of DAP Form 2-10B and 2-10C.

DAP 2-10
Revision 1Responsibilityb. Cognizant Department
Personnel.Action

- (1) Using DAP Form 2-10C, perform the Review of ETI to identify safety-related or significant non-safety-related concerns.
- (2) Recommend one or more of the following, subject to approval of cognizant department head or his designate:
 - (a) Include the ETI under Control of this Vendor ETI Procedure.
 - (b) Exempt the ETI from Control by this Vendor ETI Procedure.
 - (c) Promptly notify appropriate personnel and Nuclear Network if such ETI identifies a concern which could contribute to a degradation of safety. Nuclear Network notifications are made through the Office of Nuclear Safety.
 - (d) Recommend incorporation of ETI into:
 - i. Existing Station Procedures.
 - ii. Equipment data and/or purchasing records.
 - iii. Training Programs.
 - iv. Existing ETI Documents.
- (3) Indicate on the review whether or not the ETI should be controlled by this procedure, and indicate the criteria (safety-related or significant non-safety-related applications) on the written report.
- (4) Return ETI with written review and recommendations to Central File.

DAP 2-10
Revision 1

Responsibility

Action

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|---|--|
| c. Central File Personnel. | (1) In the case of Steps C.2.d.(2)(a), (b) or (d) iv. above, process in accordance with Section C.1.b. of this procedure. |
| | (2) In the case of Steps C.2.d.(2)(c) or (d) i. through iii. above, forward a copy of the recommendation to the appropriate Department Head or Cognizant Person. |
| d. Department Head or Cognizant Person. | Act upon recommendation as appropriate. |

3. Outgoing ETI

- a. Dresden Station participates in the NPRDS System, and Station-Generated ETI is entered into this system. In the event that a complete failure description cannot be provided within the NPRDS time frame, a preliminary report shall be submitted within that time frame, and a revision to the report shall be transmitted when the complete failure description is available.
- b. Incorrect or Incomplete Vendor ETI which may cause a Significant Degradation or Failure of Safety-Related Equipment shall be reported by the cognizant department to the Technical Staff Supervisor. This information will then be reported over the Nuclear Network by way of the Office of Nuclear Safety.

D. REFERENCES

1. Nuclear Stations Directive MO2, "Control of Vendor Equipment Technical Information."
2. "Vendor Equipment Technical Information Program", INPO 84-010 (NUTAC).
3. INPO Good Practice MA-304, "Control of Vendor Manuals".
4. DAP 2-1, Control of Station Correspondence.
5. DAP 2-2, Internal Distribution of Station Correspondence and Technical Documentation.
6. DAP 2-3, Operation and Control of the Central and Satellite Files.

Log No.	Manual Name & No.	Date to Preliminary Review	Date From Preliminary Review	Date To Final Review	Date From Final Review	Date Distributed To R ² & Depts.

FOR INFORMATION ONLY

DAP 2-10
Revision 1

FORM 2-10B

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DATE

To:

Subject: Control of Incoming Vendor Equipment Technical Information

In accordance with DAP 2-10, the attached Equipment Technical Information (ETI) is being submitted to you for Cognizant Department Preliminary Review/Station Review.

Please consult DAP 2-10 to determine your responsibilities under this program. Please also provide the requested written review to Central File as soon as possible.

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Services Superintendent

DAP 2-10
Revision 1

FORM 2-10C

TO: Central File Supervisor
SUBJECT: Review of Equipment Technical Information
DESCRIPTION OF ETI:

The attached ETI has been reviewed to determine its applicability to Dresden in accordance with DAP 2-10.

- The ETI has safety related or significant non-safety related applications and should receive control status.
- The ETI does not apply at Dresden and does not need control status.
- The transmittal does not meet the definition of an ETI according to DAP 2-10 and does not need control status.

Comments: _____

Reviewed by _____
Name/Department

Date Reviewed _____