



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

August 2, 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 Inspection Report
Nos. 50-237/84-27 and 50-249/85-13
NRC Docket Nos. 50-237 and 50-249

Reference (a): J. J. Morrison letter to Cordell Reed
dated June 6, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. I. T. Yin and J. W. Muffett during the period of December 21, 1984 to April 30, 1985 of activities at Dresden Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

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

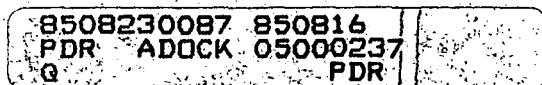
Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Dresden



AUG 5 1985

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY
RESPONSE TO NOTICE OF VIOLATION

ITEM 1

10 CFR 50, Appendix B, Criterion X, as implemented by CECO Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," and CECO Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires the licensee to establish and execute an inspection program to verify activities affecting quality are in conformance with documented instructions, procedures, and drawings.

Contrary to the above, piping suspension system hardware modifications that resulted from the Mark I program and 79-14 verification were not adequately inspected to satisfy above requirements.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Verification of the supports on the main steam and safety/relief valve discharge lines for the mentioned programs (Mark I and 79-14) has been performed to ensure that the FSAR requirements are met. Over 100 supports on the subject systems were inspected at Dresden Unit 2 and Quad Cities Unit 2. A tolerance criteria suitable for the inspected supports, was developed to assess the information found in walkdown. The mechanical component supports were analyzed to insure the tolerance criteria were acceptable. Where field conditions indicated that the tolerances were exceeded, additional calculations were performed to assess the as-found condition. The conclusion is that the re-analysis of the component supports, based on the as-found configuration, indicates that these supports are subjected to stresses within Code allowable values.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

Commonwealth Edison is revising our Quality programs to include inspection for conformance to the design documentation on future safety-related modifications. This program will be applicable to all Edison Nuclear Operating Stations, and it will ensure that all critical components in their as-built configuration meet the dimensional tolerances in the design documents.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance for the revised QC inspection program will affect only new design work and not existing installed modifications. This program will be implemented in September, 1985 for Dresden and in December, 1985 at the other stations.

ITEM 2 10 CFR 50, Appendix B, Criterion III, as implemented by CECO Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," and CECO Corporate Quality Assurance Manual, Nuclear Generating Stations, Quality Requirements, requires that design control measures provide for verifying or checking the adequacy of design, such as by the performance of design review.

Contrary to the above, the NUTECH piping transient operability analysis performed for the Dresden 2 Low Pressure Coolant Injection System did not give proper consideration to design objectives, justify the criteria established and assumptions made, and correctly model the forces experienced during the transient. NUTECH's recommendation to replace the failed snubber with a rigid restraint did not consider the potential adverse consequences on the piping.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Commonwealth Edison has implemented the following corrective actions.

1. The initial analyses issued on February 1, 1985 by NUTECH for the LPCI line were quickly superseded by other analyses after additional design input information became available and the additional work scope was agreed upon.
2. The Commonwealth Edison QA Department performed a comprehensive technical audit of NUTECH based on the NRC Region III request in May 1985. The scope of this audit included an agreement of design control measures.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

NUTECH Engineering has developed and approved a project specific criteria document for this type of evaluation. The review of the project plan by the engineering manager as required by NUTECH QEP 2-6 will assure full implementation of the requirement. It will be emphasized to Station Nuclear Engineering Department (SNED) engineers via a memo that engineering evaluations requested by a nuclear station and conducted by an architect-engineer must be reviewed and formally transmitted to the station by SNED. Until such an action occurs, the evaluation is considered issued "For Information Only".

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

SNED memo will be issued by October 1, 1985.