



Commonwealth Edison

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

November 15, 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. 50-237/85-032 & 50-249/85-028
NRC Docket Nos. 50-237 and 50-249

Reference (a): Letter from L. A. Reyes to Cordell Reed
dated October 16, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. T. E. Taylor on September 16-19, 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

lm

Attachment

cc: NRC Resident Inspector - Dresden

8511210009 851115
PDR ADOCK 05000237
Q PDR

0906K

NOV 18 1985

JFO1

ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

10 CFR 50, Appendix B, Criterion XI, as implemented by Commonwealth Edison Quality Assurance Manual, requires that test results be documented and evaluated and include conclusions and recommendations based on test results.

Contrary to the above, Surveillance Procedure No. DTS 300-2 does not provide for documented evidence that the test results have been evaluated to determine their acceptability.

Discussion

While reviewing the post-maintenance testing documentation for scram testing of single control rod drive hydraulic control units (HCU), the inspector determined that the review and approval of the test data was not properly documented. Specifically, Dresden Technical Staff Surveillance (DTS) 300-2, "Control Rod Drive Scram Testing and Scram Valve Timing Test" used for post-maintenance test of individual HCU's did not provide for documented evidence that the test results had been evaluated to determine their acceptability.

The above procedure provides for both full core scram testing and individual control rod drive scram testing. DTS 300-2 specifically states that "Technical Staff Representatives will immediately evaluate the CRD scram test results for Technical Specification compliance." For the case of full core scram testing, the cognizant Technical Staff Engineer initials and dates the computerized listing of the drives scram times upon successful completion. In the case of individual control rod drive scram testing following maintenance, a copy of the computerized listing of the scram times are provided for the work request package. For the specific surveillance results reviewed by the inspector no documented evidence could be found on the surveillance checklist that the results had been evaluated and found acceptable. However, it should be recognized that the Technical Staff Engineer performing the test did sign off on the work request that the test results were reviewed and acceptable.

Corrective Action Taken and the Results Achieved

1. A temporary procedure change was written for DTS 300-2 to include a signature indicating that the Technical Staff Engineer performing the test has evaluated the results and found them to be acceptable.
2. A temporary procedure change was also written for Dresden Administrative Procedure (DAP) 9-3, "Procedure Review and Writing" to include a statement requiring that all surveillance or test results be reviewed against known acceptance criteria and that this review along with the acceptance criteria be documented in the procedure. This will ensure that as surveillance and

Attachment A
Page 2
Corrective Action Continued

test procedures are periodically reviewed and revised, a provision for documenting both acceptance criteria, and evaluation and acceptability of test results will be verified to be in place or added as required.

Corrective Action to be Taken to Avoid Further Non-Compliance

Permanent procedure changes for DTS 300-2 and DAP 9-3 will be completed by February 28, 1986.