



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

January 24, 1986

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.
50-237/85-033 and 50-249/85-029
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from J. G. Keppler to Cordell Reed
dated December 26, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. J. Holmes and C. Ramsey of your staff between September 30 and October 21, 1985, of activities at Dresden Station. The referenced letter 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.

In addition to the response to the Notice of Violation which we have provided, we have also attached our current plans for resolving the remaining concerns that the inspector identified in his report. These plans are described in Attachment B.

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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cc: NRC Resident Inspector - Dresden
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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

DESCRIPTION OF VIOLATION

10 CFR 50.48 (a) requires that each operating nuclear power plant have a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR Part 50. It further requires that the plan shall describe specific features necessary to implement the program such as administrative controls and personnel requirements to limit fire damage to structures, systems, or components important to safety so that the capability to safely shut down the plant is ensured.

Section 3.1.A.1 of the licensee's Fire Hazards Analysis Submittal, which forms part of the licensee's approved fire protection program, states that the licensee has a Fire Protection Coordinator whose responsibilities include, in part, program coordination, equipment procurement, program enhancement, conducting inspections, and supervising training of personnel.

Contrary to the above, the licensee has failed to consistently and effectively staff the Fire Protection Coordinator position with the result that certain fire protection equipment was not installed, hardware and equipment were not being properly maintained, required training was not completed, and prompt and effective corrective action was not taken for identified deficiencies.

DISCUSSION OF RESPONSE TO THE VIOLATION

At the time Section 3.1.A.1 of the Fire Hazards Analysis was written, a Fire Protection Coordinator reported to the System Safety Department. Subsequently, the Fire Protection Coordinator was transferred to the Quality Assurance Department. Shortly thereafter, the individual filling this position retired. Currently, the Company employs three Fire Protection Engineers in the General Office. Two of these Fire Protection Engineers are in the Nuclear Services Technical Department, the third is in the Quality Assurance Department and has the title of QA Fire Protection Coordinator. Many of the Fire Protection Coordinator's duties listed in Section 3.1.A.1 are currently performed by the QA Fire Protection Coordinator, NST Fire Protection Engineers and Station personnel. Thus, subsequent to the initial submittal of Section 3.1.A.1, the Company has employed three Fire Protection Engineers in the General Office in order to improve the fire protection program.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

An NST Fire Protection Engineer is now at Dresden approximately one day per week to assist the Station. This person will continue in this capacity until the Task Force report, which is discussed below, is accepted and implemented. It is expected that the Task Force will recommend a course of action that will relieve NST from the weekly requirement.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

A task force has been assembled to examine the various fire protection duties and tasks that have to be performed on a company wide basis. The task force has been instructed to report their recommendations for improvements in the fire protection program, including organizational and staffing requirements, to the Vice President of Nuclear Operations by April, 1986.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved at such time as the task force recommendations have been reviewed, evaluated and implemented to the extent deemed necessary. We will provide a follow-up response addressing the task force recommendations by July 1, 1986.

ATTACHMENT B

COMMONWEALTH EDISON COMPANY

PLANS FOR RESOLVING FIRE PROTECTION ISSUES

This attachment responds to the issues identified in the routine safety inspection conducted by Messrs. J. Holmes and C. Ramsey at Dresden Nuclear Power Station on September 30 through October 21, 1985. Many of the items identified by the inspectors as examples of programmatic breakdowns had already been identified during a review of the regulatory, commitment, and code compliance in the fire protection area at our operating stations. We feel that the review which we had undertaken has demonstrated our commitment to ensuring that all fire protection features at our stations have been implemented.

Our present expectations for addressing those items identified by the inspector as indicative of a programmatic breakdown are as follows:

- A. The fire detection system not installed on the refueling floor (Paragraph 7.a of the inspection report) was identified as part of the Company's Appendix R reassessment project. Since the SER items were presented previously at the enforcement conference, no further response is required at this time.
- B. Maintenance of fire protection equipment and hardware was corrected as follows:
 - (1) Work is in progress to chain and lock the hose station root valves. (Paragraph 2d of the inspection report) We expect that the valves will be locked and procedure revisions will be completed by August 31, 1986.
 - (2) A modification was initiated in 1984 to install fire detection and sprinkler system alarms in accordance with NFPA 72 D. (Paragraph 2e of the inspection report). This modification and related surveillance procedures will be completed and placed in service in sections. All portions of the modification are presently scheduled to be complete by the end of the Fall 1986 Unit 2 Refueling outage.
 - (3) Items identified by the inspector's review of Technical specification surveillances (Paragraph 4 of the inspection report) are being resolved as follows.
 - a.) Diesel Fire Pump surveillance procedures are in the process of being revised as a result of our NFPA Code Review. These revised procedures are expected to be implemented by August 31, 1986.

b.) Water suppression system surveillance procedures and piping changes are in progress as a result of our NFPA Code Review. These revised procedures and necessary piping changes are expected to be implemented by August 31, 1986.

c.) A modification is in progress on our fire detection system, and surveillance procedures are being revised in accordance with NFPA 72D as a result of our NFPA Code review. This modification and related surveillance procedure will be completed and placed in service in sections. All portions of the modification are scheduled to be complete by the end of the Fall 1986 Unit 2 Refueling outage.

(4) In the area of Administrative Controls (Paragraph 5 in the report) the inspectors cautioned the licensee on a proposed revision to welding and cutting procedure DMP 4100-1 that would include a provision to facilitate ALARA concerns in high radiation areas.

DMP 4100-1 will be revised to clearly require the 30 minute fire watch within line-of-sight of the work area. This procedure was in the process of revision as a result of our NFPA Code Review. This revision is presently scheduled for completion by March 14, 1986.

(5) During tours of the plant (Paragraph 7 of the inspectors report) the inspector identified deficient conditions which are being corrected as follows:

a.) The inspector identified the lack of refueling floor detection as a violation. The violation notice indicated no further response is necessary for this item.

b.) The inspector raised concerns about isolation of Unit 1 from Units 2 and 3, and administrative controls and actions necessary to separate common areas in Units 2/3 while Unit 2 is operating and Unit 3 is in an extended outage. A stricter transient combustible control procedure is being developed, and is presently scheduled for implementation by September 30, 1986. A cognizant foreman has been designated to assist the fire marshal in timely correction of housekeeping deficiencies. The Unit 3 Recirculation Piping Replacement primarily involves the drywell of the shutdown unit and does not affect common fire barriers. However, a detailed memorandum discussing the proper handling of fire barriers has been discussed with all personnel at the Station as part of the weekly "tailgate" staff meetings. Also procedure DFPP 4175 -1, Fire Barrier

Integrity and Maintenance, has been revised to further clarify the proper handling and maintenance of fire barriers, including fire doors, fire walls, penetration seals for mechanical and electrical components, and fire dampers. The separation of Unit 1 is being covered by the Appendix R review program. This information is being added to the updated Fire Hazards Analysis for Units 2 and 3.

c.) A procedure is being developed by the Radiation/Chemistry Department which will provide standards for the proper refilling of the SCBA air packs. This procedure will be posted at the air pack refilling station. The procedure is presently scheduled to be implemented by June 30, 1986.

d.) The missing door and glass cover have been replaced on the carbon dioxide system storage tank.

- C. The inspector identified technical specification surveillance procedures that did not incorporate appropriate testing of quality-affecting parameters in accordance with design and governing code requirements. (Paragraph 4 of the inspectors report). Our resolution to items in Paragraph 4 of the inspectors report is discussed above.
- D. The inspection report states that administrative controls did not adequately control fire protection features as discussed in Paragraph 5 of the report. As indicated in our above response to paragraph 5, the welding and cutting procedure is being revised to resolve the inspector's concern.
- E. The inspection report stated that many deficiencies identified in LERs, NRC inspections, QA audits and QA surveillances did not receive prompt or effective corrective action. These items are identified in Paragraphs 2 and 6 of the report. Their resolution is as follows.
- (1) The long term corrective actions have been completed for the Auxiliary Electric Equipment Room HVAC dampers. (Paragraph 2a of the report)
 - (2) Paragraph 2d discusses hose station root valves. Our resolution is discussed above.
 - (3) Paragraph 2e discusses the interconnection of the security system computer with the plant fire detection and sprinkler system alarms. Our resolution is addressed by the proposed implementation of the 1984 modification to install fire detection and sprinkler alarms for NFPA 72D.

- (4) Paragraph 2l discusses deficiencies in portable fire extinguishers. A dedicated work crew has been established to eliminate the backlog of fire protection work requests. As of January 8, 1986, this backlog has been eliminated. The fire extinguisher discrepancies are tentatively scheduled for completion of corrective action by January 31, 1986.
 - (5) Paragraph 2m discusses fire brigade drills and training. An assessment will be made of fire brigade drills, training, and practice sessions, and the three-year independent critiques of fire brigade drills. The assessment is presently scheduled to be completed by August 31, 1986.
 - (6) Paragraph 2n discusses Pre-fire plans. Pre-fire plans have been developed and are in the process of being implemented. Full implementation is expected by March 14, 1986.
 - (7) Paragraph 2o discusses hands-on fire brigade training. As stated above, an assessment will be made of fire brigade training.
 - (8) Paragraph 6 discusses the apparent lack of prompt and effective corrective actions to problems identified by the QA program. As discussed above, a dedicated work crew has been established to eliminate the backlog of fire protection work requests.
- F. The inspection report identifies weaknesses in the scheduling of fire drills. (Paragraphs 2m and 2o of the report) As discussed above, an assessment of the brigade training program will be made.

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