



Commonwealth Edison

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

March 11, 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.
50-237/85-040 and 50-249/85-038
NRC Docket Nos. 50-237 and 50-249

Reference (a): Letter from C. J. Paperiello to Cordell
Reed dated January 24, 1986.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. M. M. Moser and T. E. Taylor of your staff on December 2-6, and 16-19, 1985, of activities at Dresden Station. The referenced letter requested we respond to four recommendations made regarding our maintenance program. Our response is provided in the enclosure.

If you have any further questions regarding this matter, please contact this office.

Very truly yours,

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

lm

Attachment

cc: NRC Resident Inspector - Dresden

1359K

8603180209 860311
PDR ADOCK 05000237
Q PDR

MAR 13 1986

FE01

ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO RECOMMENDATIONS

RECOMMENDATION A

Expedite the implementation of an effective maintenance history and trending program.

ACTIONS TAKEN AND PLANNED

The Mechanical and Electrical Maintenance Departments have fully implemented a computer based maintenance history and trending program. The Instrument Maintenance Department has initiated the same program. It is anticipated that 50% or approximately 4,000 components will be entered into the computer data base by the end of 1986. In addition, a revision to procedure DAP 4-3 "Equipment History and Trending" will be submitted by approximately June 1, 1986 and implemented during July to reflect effective use of the computerized trending program.

RECOMMENDATION B

Expedite the reduction of the work request backlog and provide necessary resources to ensure that it is maintained at an acceptable level.

ACTIONS TAKEN AND PLANNED

Maintenance has set a year-end goal of achieving and maintaining less than 1100 backlogged work requests for non-outage corrective maintenance. Methods used to achieve and surpass this goal will be the periodic administrative review of work requests over two years old, improved pre-planning for multiple work requests written on a given plant component and the use of facility blanket work requests. Additionally, Maintenance has fully implemented a pending work request program which allows segregation of work requests by various fields (i.e., safety-related, control room related, outage related, non-outage related, corrective maintenance, preventive maintenance, or facility maintenance). The ability to easily separate the work request backlog into these categories will allow for better control and prioritization of work requests.

RECOMMENDATION C

Evaluate the scope and effectiveness of the PM program and take those actions necessary to redirect the present corrective maintenance philosophy to a more predictive maintenance approach.

ACTIONS TAKEN AND PLANNED

Dresden Maintenance has evaluated the present scope of the preventive maintenance approach and agrees that changes are required to provide a more effective program. The program will include predictive maintenance, periodic maintenance, and planned maintenance. Procedure DAP 4-2 "Preventive Maintenance Program" will be revised in July, 1986 to reflect the reorganization and the assertive approach to preventive rather than corrective maintenance. Predictive maintenance and the trending of maintenance history will form a major portion of our preventive maintenance program. The predictive components are designed to provide early warnings of the need for either increased periodic maintenance or a sound basis for planned maintenance.

RECOMMENDATION D

Provide better information relative to, and trending of those indicators of plant reliability and operation which would benefit management personnel in their oversight responsibilities.

ACTIONS TAKEN AND PLANNED

Dresden Station's On-Site Review Committee meets quarterly to evaluate trends in LERs, DVRs, Q.A. Audits, Radiation Occurrence Reports and Security events. Trends in areas such as personnel error and equipment failure are identified and discussed during these meetings. Those trends which precipitate out of the revisions to DAP 4-3 will be incorporated into the quarterly on-site review meetings. Senior station management as well as department heads are active on the On-Site Review Committee. In addition, the Assistant Superintendent - Operating has implemented a scram reduction program in which maintenance personnel participate any time scrams are attributed to either maintenance personnel error or inoperable components. Participation on these committees provides management with a tool which benefits oversight responsibilities.