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DMB

December 13, 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 1, 2 and 3
 Response to Inspection Report Nos.
 50-010/85-13, 50-237/85-30 & 50-249/85-26
NRC Docket Nos. 50-010, 50-237 & 50-249

Reference (a): Letter from N. J. Chrissotimos to Cordell
 Reed dated November 15, 1985

Dear Mr. Keppler:

This letter is in response to the inspection conducted by L. G. McGregor, T. M. Tongue, S. Stasek, and E. A. Hare on August 20 through October 31, 1985, of activities at Dresden Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. Commonwealth Edison Company disagrees with the basis for the Notice of Violation and we request you review your conclusions in light of the additional information we are providing in the attachment.

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

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

PROPOSED NOTICE OF VIOLATION

10 CFR 50, Appendix B, Criterion VI, as implemented by CECO Quality Assurance Manual, Section 6, states "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

Contrary to the above, the licensee failed to revise the Technical Specification for Unit 3, in that section, 3.5.A.7, was not updated to reflect that a section, 3.5.G, referenced in 3.5.A.7 had been deleted per United States Atomic Energy Commission letter dated April 17, 1974.

BASIS FOR THE COMMONWEALTH EDISON COMPANY DENIAL

The following states your findings during the routine inspection:

"During the inspection period, the Resident Inspector reviewed portions of Dresden Technical Specifications for Units 2 and 3. During the review, the Inspector noted a discrepancy between the two. Unit 3 Technical Specifications Section 3.5.A.7 was not revised to reflect that the referenced Section 3.5.G had been deleted. Section 3.5.A.7 of Unit 3 Technical Specifications states that "If the requirements of 3.5.A cannot be met, either 3.5.G shall be complied with or an orderly shutdown of the reactor shall be initiated..." Section 3.5.G had been deleted from both units' Technical Specifications per United States Atomic Energy Commission letter dated April 19, 1974. Section 3.5.G had included a reporting requirement for an alternative to shutdown of the reactor if the limiting condition for operation for the core and containment cooling systems could not be met. The reporting alternative was removed so that the specified system must either be operable or the unit brought to a shutdown condition. When the Technical Specifications were revised to indicate the change, the reference to Section 3.5.G was not removed from Section 3.5.A.7 of Unit 3 Technical Specifications. Unit 2 Technical Specifications had been revised properly to show the change. None of the "Controlled" copies of Unit 3 Technical Specifications which were reviewed by the Resident Inspector, including those in the Technical Support Center or Control Room were found to reflect this change."

The above description does not fully describe the circumstances that led to the Technical Specification discrepancy, therefore we are providing additional relevant information that is the basis for our denial of this non-compliance.

The deletion of Technical Specification 3.5.G was not the result of a change initiated by Commonwealth Edison (CECo), but instead was an imposed change resulting from a review in April, 1974 of our Technical Specifications by the Atomic Energy Commission (AEC). By letter dated April 19, 1974, K. R. Goller to J. S. Abel, the AEC informed CECo that approval had been granted for proposed Technical Specification changes involving the Containment Atmospheric Dilution System (CAD) and Primary Containment Vacuum Breakers. In addition, the AEC informed CECo that as a result of their continuing review of the entire Technical Specifications, several requirements regarding Main Steam Line Tunnel Radiation Monitors, the Standby Liquid Control System, the Core and Containment Cooling Systems, Reactor Coolant Chemistry, Jet Pumps, and Reporting were going to be revised in order to be consistent with current requirements at other boiling water reactors, and to enhance safety. The CECo proposed changes along with the AEC imposed changes became Change No. 28 to DPR-19 and Change No. 19 to DPR-25. Specifically, Section 3.5.G, which contained the reporting requirement for Core and Containment Cooling Systems, was deleted by the AEC along with the reference to Section 3.5.G in the following sections: 3.5B, C, D, E and F. It appears that in their review of these sections containing the reference to 3.5.G, the AEC inadvertently failed to detect and delete the reference to 3.5.G that was included in Section 3.5.A.7. Neither the AEC or CECo noticed the error at this time.

The following year an unrelated revision was being made to Unit 2 Technical Specification Section 3.5.A.7 on an expedited basis to allow going to the Refuel Mode for post maintenance testing of control rod drives, provided no work was being done which had the potential to drain the reactor vessel. The proposed change was reviewed under Dresden Nuclear Power Station On-Site Review #75-28 dated April 3, 1975, and the reference to Section 3.5.G was deleted at this time. Since Dresden Unit 2 required this immediate revision to Section 3.5.A.7 to allow outage work to continue on control rod drives and the Core Spray system concurrently, the revision was made for Unit 2 only and Unit 3 Technical Specifications were not reviewed at this time. The discrepancy between the two units' Technical Specifications regarding 3.5.G therefore was not an oversight or neglect, but a result of unrelated circumstances. Had Section 3.5.A.7 not been revised to allow testing of the CRD's in Refuel Mode, the reference to 3.5.G would not have been removed at that time.

Based on the fact that the deletion of Technical Specification 3.5.G was not a change initiated by Commonwealth Edison, and the fact that the failure to delete the reference to Section 3.5.G in Section 3.5.A.7 was not an error on Commonwealth Edison's part, we feel the non-compliance is not justified. The above supporting information is the basis for our denial of this non-compliance, and we would appreciate your consideration of a retraction. To correct the situation however, we are preparing a revision to Section 3.5.A.7 of Unit 3 Technical Specifications. It will be submitted by January 31, 1986 to delete the reference to Section 3.5.G.