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June 28, 1988

Mr. James Lieberman, Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Dresden Station Unit 3
Reply to a Notice of Violation
Inspection Report Nos. 50-
237/86013; 50-249/86015
NRC Docket No. 50-249

Reference (a): April 29, 1988 A.B. Davis
Letter to J.J. O'Connor

Dear Mr. Lieberman:

This is Commonwealth Edison's reply to the Notice of Violation concerning the environmental qualification of AMP nylon-insulated butt splices at Dresden Station Unit 3. See Reference (a). An accompanying letter from Commonwealth Edison's lawyers, Sidley & Austin constitutes CECO's Answer to the proposed imposition of a \$150,000 civil penalty in this matter. In a telephone conversation with Irene M. Johnson of Commonwealth Edison, you granted the Company an extension for filing these responses until today, with an assurance that if additional time was needed to file supplemental information, it would be granted. This Reply and the Sidley & Austin Answer are complete, with the exception of an affidavit from James S. Abel, Commonwealth Edison's BWR Engineering Department Manager, which will be submitted in the near future.

ALLEGED VIOLATION.

CFR 50.49(f) requires each item of electrical equipment important to safety to be environmentally qualified by testing and/or analysis.

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10 CFR 50.49(k) specifies that requalification of electric equipment important to safety is not required if the Commission has previously required qualification in accordance with "Guidelines for Evaluation Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors," November 1979 (DOR Guidelines).

DOR Guidelines, Section 5.2.2, states that type tests should only be considered valid for equipment identical in design and material construction to the test specimen and any deviations should be evaluated as part of the qualification documentation.

Contrary to the above, as of December 6, 1986, AMP nylon-insulated butt splices, used in numerous items of electrical equipment important to safety, were not properly environmentally qualified in accordance with DOR Guidelines by type testing. While a type test was done, the tested splices were not demonstrated to be identical to the installed AMP splices and this deviation was not evaluated as part of the documentation in the qualification file.

1. Admission or Denial of the Alleged Violation.

Commonwealth Edison admits that it was unable to demonstrate that the AMP splices were environmentally qualified, based on the results of testing conducted at CECO's initiative in December 1986. It does not agree that the documentation in its files as of December 6, 1986 was inadequate to demonstrate that the AMP splices were properly qualified in accordance with the DOR Guidelines by type testing and analysis. However, the Company believes that this documentation issue has been superceded by the December 1986 test results and further argument as to the adequacy of documentation would not be useful or constructive.

2. Reasons for the Alleged Violation.

The violation occurred due to the unexpected failure of the December 1986 tests to confirm the environmental qualification of the AMP splices based on type testing and analysis. There is a

possibility that the December 1986 tests, which were conducted in accordance with Category I requirements, were more severe than the old G.E. tests which formed the basis for CECO's environmental qualification judgment. In addition, it appears that certain information related to the old G.E. tests was not documented by G.E. in its test records and therefore was not considered by CECO or its consultants prior to receiving the December 1986 test results.

3. Corrective Actions Taken and Results Achieved.

Commonwealth Edison shut down Dresden Unit 3 and made appropriate repairs to the affected splices with qualified tape, using approved procedures and properly trained personnel. Region III personnel witnessed these repairs.

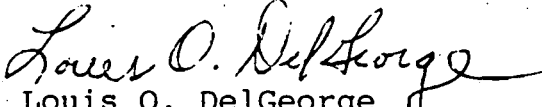
4. Corrective Steps Taken to Avoid Further Violations.

Commonwealth Edison has taken administrative steps to preclude the future use of these splices in EQ circuits at Dresden.

5. Date When Full Compliance Was Achieved.

Corrective actions were complete as of December 1986 when the Dresden Unit 3 returned to operation.

Respectfully submitted,


Louis O. DelGeorge
Assistant Vice President

yc/LOD

cc: A.B. Davis
Dresden Resident Inspector