



Commonwealth Edison

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

February 1, 1989

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Notice of Violation
Nos. 50-237/88010-06 and 50-249/88012-06
NRC Docket Nos. 50-237 and 50-249

Reference: J.J. Harrison letter to Cordell Reed dated
January 3, 1989 including Notice of Violation
concerning improper storage of transient
combustible liquids.

Dear Mr. Davis:

The referenced letter provided the results of special safety inspections conducted by Messrs. J. Holmes, R. Hodor, and K. Parkinson on April 18-22, May 11-3, August 15 and December 13, 1988, of Fire Protection activities at Dresden Nuclear Power Station. During the course of these inspections, certain activities appeared to be in noncompliance with NRC requirements. As requested, a response to Item 2 of the Notice of Violation is provided in the Attachment.

Commonwealth Edison understands the significance of the issues identified in the Notice of Violation and has implemented corrective actions to prevent recurrence. Although several other aspects of the Inspection Report warrant clarification, our comments will be provided via a separate transmittal.

8903080068 890201
PDR ADDCK 05000237
Q PDC

FEB 3 1989

DECI 1/2

February 1, 1989

If there are any further questions regarding this response, please contact this office.

Very truly yours,



H. E. Bliss
Nuclear Licensing Manager

lm

Attachment

cc: B.L. Siegel - Project Manager, NRR
S.G. DuPont - Senior Resident Inspector, Dresden

5528K

ATTACHMENT

COMMONWEALTH EDISON COMPANY

REPLY TO NOTICE OF VIOLATION

VIOLATION

10 CFR 50.40(a) requires that each operating nuclear power plant have a fire protection plan that satisfies General Design 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 the means to limit fire damage to structures, systems, or components important to safety so that the capability to safely shutdown the plant is ensured.

Section B.2 of the licensee's response to the Guidelines of Appendix A to Branch Technical Position APCS 9.5-1 as accepted in the 1980 Supplemental Safety Evaluation Report indicates that effective administrative measures will be implemented to prohibit bulk storage of combustible materials inside or adjacent to safety-related buildings or systems during operation or maintenance periods.

Contrary to the above, during a previous inspection conducted on April 12, 1988, an NRC inspector observed twenty 55-gallon drums of lubricating oil stored in a safety-related area on Elevation 517' - 6" (in the southwest corner) of the Unit 2 Reactor Building. This condition existed from March 31 to April 13, 1988. This is a Severity Level IV violation (Supplement I).

BACKGROUND INFORMATION

As part of the Unit 3 refuel outage, the Unit 3 HPCI turbine was inspected and required maintenance performed. This inspection included draining the lube oil reservoir and either cleaning or replacing the oil. The Unit 3 HPCI lube oil reservoir was drained into twenty 55 gallon drums located on Elevation 517 of the Unit 3 Reactor Building (southeast corner). Shortly after this job was completed, other outage work required the "3A" LPCI heat exchanger be accessible. To obtain access to the "3A" LPCI heat exchanger, the oil drums had to be relocated. The Fire Marshal was contacted and determined that the barrels could be moved to Unit 2 Reactor Building Elevation 517 with no additional fire protection, based on:

- (1) it being a low traffic area,
- (2) the fire detection system was available,
- (3) safe shutdown could still be achieved,

- (4) the characteristics of the lube oil (being difficult to ignite and having a relatively high flash point),
- (5) no other work being performed or combustibles being stored in the area, and
- (6) the increase in fire loading did not exceed a low fire loading (i.e., less than 100,000 BTU/ft²), based on the storage area involved, as defined in the NFPA handbook (15th edition).

Despite the above, CECO understands the inspector's concern regarding the storage of significant quantities of transient combustible liquids in safety related areas of the plant without additional compensatory measures.

CORRECTIVE ACTION AND RESULTS ACHIEVED

On April 13, 1988, the barrels of lubricating oil were removed from the Unit 2 Reactor Building, thus eliminating the concern.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NON-COMPLIANCE

Dresden Administrative Procedure (DAP) 3-3, "Control of Transient Combustible Storage Areas and No Smoking Areas," will be revised by the Fire Marshal and a Fire Protection Engineer from Support Services. The revision will ensure that routine bulk storage of transient combustibles will not exist in the plant except in designated areas. The revision will establish temporary bulk storage guidelines defining the time a specified amount of transient combustibles will be allowed in a non-designated area and compensatory measures to be taken during that time. In addition, future reviews will be based strictly on the total amount of combustibles allowed in an area. The procedure revision will be completed by March 31, 1989.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on April 13, 1988