

MAY 0 8 1989

Docket No. 50-237
Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

This refers to the team inspection conducted by A. M. Bongiovanni, V. P. Loughheed, F. A. Maura, and P. R. Rescheske of this office on November 1, 1988, through March 30, 1989, of activities at Dresden Nuclear Power Station authorized by NRC Operating Licenses No. DPR-19 and No. DPR-25 and to the discussion of our findings with Mr. J. Brunner at the conclusion of the inspection.

The purpose of this inspection was to determine if design changes and modifications and the dedication of commercial grade equipment for safety-related applications were being conducted in accordance with regulatory requirements. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

The results of this inspection indicated that for the limited number of modifications examined, corrective actions responding to the previous SSOMI findings appear to have been generally effective. The design calculations and 10 CFR 50.59 safety evaluations were of good quality. However, some weaknesses in the areas of post-modification testing; attention to detail; and commercial grade procurement, receipt inspection, and dedication were noted as follows:

1. Tests performed on 125 vdc and 250 vdc batteries by your Operational Analysis Department were not consistent with design test specifications. In the several instances observed, design engineering was not consulted on the deviations, which had the effect of negating the purpose of the test.
2. Completed modification packages were reviewed by all required groups and approved when they contained obvious errors such as test results not meeting acceptance criteria, bolt projection length had "shrunk" after torquing, and bus voltage higher than the associated battery voltage, a physical impossibility.
3. The procurement and receipt inspection process failed in several instances to identify critical characteristics for material purchased as commercial grade, and the receipt inspection consisted of nothing more than a verification of part number on the outside of a box. In one case,

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this led to the installation of a globe valve instead of the required stop check valve. This was not identified until performance of the post-installation test.

- 4. In modifying the 250 vdc battery, load shedding design assumptions were not incorporated into operating procedures. This is significant as the battery life calculation were based on certain dc loads being shed by operator action.

Some of the above concerns appear to be in violation of NRC requirements, as specified in the enclosed Notice. With respect to Item C, the inspection showed that actions had been taken to correct the identified violation and to prevent recurrence. Our understanding of your corrective actions is described in Paragraph 6 of the enclosed inspection report. Consequently, no reply to that violation is required and we have no further questions regarding this matter at this time. Regarding the remaining items, a written response is required.

Your responses should also address the following specific issues. (1) how you will eliminate unauthorized changes made to post-modification testing requirements by groups outside of the Engineering Department involved with the initial design and testing specifications; (2) your measures to increase the level of attention to detail in the review of completed modification packages; and (3) the measures you have taken or plan to take to ensure that material purchased as commercial grade but installed in safety-related applications have clearly defined critical characteristics for the safety-related application and the material can be shown to have met those characteristics prior to installation in the safety-related application.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

Hubert J. Miller, Director
Division of Reactor Safety

See Attached Distribution

RIII
Maura/jh
Harrison
5/15/89

RIII
Bongiovanni
Wright

RIII
Lougheed

5/18/89

RIII
Rescheske

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RIII
Phillips

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Enclosures:

1. Notice of Violation
2. Inspection Reports
 No. 50-237/88025(DRS);
 No. 50-249/88027(DRS)

Distribution

cc w/enclosures:

T. Kovach, Nuclear
 Licensing Manager
J. Eenigenburg, Plant Manager
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Richard Hubbard
J. W. McCaffrey, Chief, Public
 Utilities Division