



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

May 26, 1989

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Status of DCRDR Implementation
Following Second Refueling Outage
NRC Docket No. 50-237

- References (a): February 13, 1989 Conference Call from CECO
(J. Silady, J. Eenigenburg, R. Howard, et al.)
to NRC (T. Ross, R. Eckenrode, M. Ring et al.)
- (b): February 28, 1989 letter from J.A. Silady to
T.E. Murley
- (c): May 5, 1989 Conference Call from J.A. Silady
and B. Zank to B. Siegel

Dr. Murley:

Enclosed is an updated status report concerning the DCRDR implementa-
tion schedule for those Dresden Unit 2 Human Engineering Discrepancies (HEDs)
which could not be completed during the "Second Refueling Outage", i.e. the
end of Cycle 11 outage.

The schedule was previously modified prior to restart per the
Reference (a) agreement which was documented in Reference (b). This letter
documents a more recent update which was provided via Reference (c).

Please note that the Attachment B status table is provided in the
same format as that provided in Reference (b). It is described in more detail
in Attachment A.

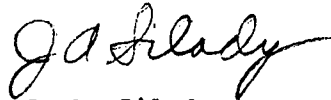
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As previously agreed, CECO will utilize any opportunity provided by unscheduled outages of 16 hours or longer, which may occur prior to the December, 1989 dual unit outage, to complete work on the relatively small number of remaining HEDs.

Please contact this office should further information be required.

Very truly yours,



J. A. Silady
Nuclear Licensing Administrator

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Attachments

cc: A.B. Davis - Regional Administrator, Region III
B.L. Siegel - Project Manager, NRR
S.G. DuPont - Senior Resident Inspector, Dresden

ATTACHMENT A

DESCRIPTION OF DRESDEN 2 DCRDR STATUS

FOR INCOMPLETE HEDS

The Reference (a) conference call detailed the status of the Dresden Unit 2 DCRDR implementation schedule and the scope of the proposed scheduled change. Attachment B to this letter details the progress of those rescheduled items. Attachment B is presented in the same format as Attachment A to the Reference (b) letter, showing the proposed completion and the current completion status of the components in the 19 HEDs items with residual work remaining at the time of unit start-up following the second DCRDR outage.

Work on several HEDs is ahead of the References (a) and (b) implementation schedule. For other items, the resolution that is required has further impacted the timeframe necessary to complete them. These items were discussed with the NRR Project Manager for Dresden prior to exceeding the 75 day post-startup period in the Reference (c) conference call.

Columns 1 thru 4 of Attachment B briefly describe the Index items. The total number of components for each item is listed in the fifth column. The sixth column lists the total number of components that were proposed to be completed within 75 days followed by the actual number of components completed. "NA" indicates none were scheduled during the 75 day period.

The last column of Attachment B, lists the number of components that were proposed to be completed after 75 days from the Unit 2 startup. The last column also reflects the total number of components "left to do," whether they were initially proposed to be done within 75 days or not. Because this letter is being sent after the 75 day time period, it reflects those items that were also completed after the 75 days from the Unit 2 start-up. The "left to do" column therefore reflects the to-date status of the number of components remaining to have HED corrective action resolutions completed.

Ten of the 19 HEDs reported in the February 28, 1989 letter have been completed. These are indicated by a "1" superscript in the last column of the status table. Of the components that are not yet modified to meet the recommended human factors criteria, for Index 170, 172, 310 on FSR page 428, there are 26 recorder indicators that were discussed in the May 5, 1989 telephone call. These components are now rescheduled to be completed after 75 days due to problems in finding an acceptable method of rescaling. Dresden Station expects to have a resolution shortly. Once the resolution is determined to be adequate by Human Factors Engineering, it will take five to six weeks to implement.

Of the eight components remaining under Index 210/FSR 171, seven components are recorders and the eighth is a controller. The controller requires the unit to be shutdown prior to being taken out of service. These components are shifted to be completed "after 75 days" from the Unit 2 startup.

The nine Index items in Category/Level 2B that dealt with controllers are currently ahead of the proposed implementation schedule. There were initially 10 controllers in question (Index 516 duplicated the component list of Index 515, 610). The numbers of components listed in the February 28, 1989, table for these HEDs were incorrect. There are presently only three components remaining to be worked on. These three all require a unit outage to be taken out-of-service as required to meet the HED corrective action.

Work packages have been developed to facilitate the completion of all open work for these items and all remaining components. To reiterate our resolution, any opportunity provided by unscheduled outages of 16 hours or longer, prior to Unit 2/3 dual outage, will be used to work on any open HED items.

ATTACHMENT B

SCHEDULE CHANGE UPDATE

<u>CATEGORY/ LEVEL</u>	<u>HED INDEX</u>	<u>FSR PAGE</u>	<u>GENERAL CHARACTERIZATION</u>	<u>NUMBER OF COMPONENTS</u>	<u>WITHIN 75 DAYS AFTER START-UP</u> Proposed/Completed	<u>LONGER THAN 75 DAYS</u> Proposed/left to do
1B	305	178	Meter scale graduations	42	33/35	9/7
1B	572	304	Meter scale divisions	2	NA	2/0 ¹
1B	210	171	Numeral height	20	17/12	3/8
1C	216	173	Stroke width/character height	4	4/4 ⁴	0/0 ¹
1C	218	175	Numeral height/numeral width	1	NA	1/1
1C	170,172,310	428	Recorder pointers obscure scales	26	26/0	0/26
1C	394	445	Recorder not printing clear numbers	1	1/1 ⁴	0/0 ¹
2B	515,610	151	Controller	(10) ² 1	(4) 1/1 ³	(6) 0/0 ¹
2B	516	152	Controller	(10) 1	(4) 1/1	(6) 0/0 ¹
2B	517	153	Controller	(10) 1	(4) 1/1	(6) 0/0 ¹
2B	520,599	155	Controller	(10) 1	(4) 1/1	(6) 0/0 ¹
2B	526	160	Controller	(10) 2	(4) 0/0	(6) 2/2
2B	528	162	Controller	(10) 1	(4) 0/0	(6) 1/1
2B	413	168	Controller	(10) 4	(4) 4/4	(6) 0/0 ¹
2C	436	190	Color Code	EHC Panel	NA	X/X

¹ These HED corrective actions have been completed.

² All values in parentheses were errors in the 2/28/89 transmittal as discussed in Attachment A.

³ The same component is listed in Index 516.

⁴ Actual completion date <85 days after start-up.