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July 21, 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
 Clarifications to NRC Inspection Report
 Nos. 50-237/89010; 50-249/89009
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from H.J. Miller to Cordell Reed dated
 June 9, 1989, transmitting subject report on
 the April-May, 1989 EQ inspection.

Mr. Davis:

The subject report, which documented the April-May 1989 EQ inspection at Dresden, identified one unresolved item. Although no response was required by the referenced letter, we noted several items during our review of the report that we believe require some clarification. These items, several of which have previously been discussed with your staff, are discussed in the Attachment.

Commonwealth Edison fully appreciates the significance and potential impact of the inspector's concerns with certain aspects of Dresden Station's Environmental Qualification (EQ) Program. We believe that the Station, with the assistance of Engineering and Construction, has implemented the appropriate actions to address these concerns.

Please contact this office should further information be required.

Very truly yours,

J. A. Silady
 Nuclear Licensing Administrator

lm

Attachment

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

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ATTACHMENT

CECO CLARIFICATIONS TO THE APRIL-MAY, 1989

DRESDEN EQ INSPECTION REPORT

NOS. 50-237/89010; 50-249/89009

1. The third paragraph of the transmittal letter contains the Station's commitment to perform physical inspections of EQ circuit electrical enclosures (i.e., pull boxes, junction boxes, and all other enclosures capable of being opened) with an indicated completion date of September, 1989. The Station has commenced these inspection activities and plans to continue the inspections in accessible areas of the plant during normal operation. The remaining inspections in plant areas not accessible during normal operation will be inspected during the next refuel outage on each unit. These outages are currently scheduled to begin in November, 1989 for Unit 3 and September, 1990 for Unit 2.

2. The fourth paragraph of the transmittal letter contains a statement of understanding regarding the transfer of on-site EQ activities to the Technical Staff and QA/QC involvement in EQ activities. The Station plans to transfer the on-site EQ activities from the Maintenance Department to a Technical Staff engineer. QA/QC involvement in EQ program activities has been ongoing and is outlined as follows. The Quality Control Department is involved in EQ activities through their normal day-to-day interaction in the work request and procedure hold/witness point processes. The Quality Assurance organization provides its overview of the Environmental Qualification area through audits, surveillances, and/or witness points in the work packages. In the current QA audit schedule, an annual audit of the Station EQ program is required, while the current surveillance schedule requires a quarterly EQ program surveillance. Additionally, QA has the opportunity to assign mandatory hold and/or witness points in work packages to observe work in progress. Also, as part of the QA audit deficiency review process, a closed audit deficiency is re-examined three times in the subsequent 12 months to assure corrective action remains in effect. It is believed that these elements provide an integrated, balanced QA overview of the EQ program at Dresden Station.

3. The first sentence of the first paragraph on page six of the Inspection Report states; "...per plant procedures, all terminal boxes were required to have drain holes." The Station wishes to clarify this statement as follows: "...per the Marathon terminal block EQ binder, all EQ junction boxes containing Marathon terminal blocks were required to have drain holes."

4. The second sentence of the fourth paragraph on page six of the Inspection Report states; "The action plan consists of an inspection of all equipment termination..." Since the Station has already inspected and documented EQ equipment termination (as opposed to junction box terminations) during the EQ Program implementation efforts, a re-inspection of these terminations is not included as part of the corrective action in LER 89-005.

5. Bulleted item number five on page seven of the Inspection Report states; "There are no splices in pull boxes or condulets." To the best of the Station's knowledge, there are no splices in EQ circuit pull boxes or condulets that are unqualified. Known EQ circuit splices in pull boxes or condulets are Raychem or qualified tape splices and have been documented. However, to ensure that any splices in EQ circuit pull boxes and condulets are identified, all pull boxes and condulets are being inspected.

6. Bulleted item number six on page seven of the Inspection Report states; "All boxes containing terminal blocks are required to have drain holes." The Station wishes to clarify this statement as follows: "All EQ boxes containing Marathon terminal blocks are required to have drain holes." Even though not required, the Station is drilling weep holes in all junction boxes as part of the inspection program. Again, all EQ circuit pull boxes, junction boxes, etc. are included in our current inspection program, and any needed drain holes will be drilled, as appropriate.

7. Finally, with regard to ongoing inspection/surveillance for drain holes, the Station's existing EQ binder surveillance check lists include an inspection of EQ terminal box drain holes for obstruction.