

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden, Units 2 and 3

Docket Nos. 50-237; 50-249
Licenses No. DPR-19; DPR-25
EA 87-51

During an NRC inspection conducted during the period December 8, 1986 through January 13, 1987, and an NRC investigation conducted during the period September 29, 1987 through June 23, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation is listed below:

Technical Specification 6.2 requires that detailed plant operating procedures, including applicable checkoff lists, for Offsite Dose Calculation Manual (ODCM) implementation be prepared, approved, and adhered to. Section 8.2.3 of the Dresden ODCM states that administrative and procedural controls to ensure proper control of liquid radwaste releases are documented in Dresden Operating and Administrative Procedures. Dresden Operating Procedure DOP 2000-28 "Radioactive Waste Discharge to the River" implements the ODCM specified controls by requiring, among others, that valve lineups be performed for each release, that the shift supervisor or his designee verify the valve lineups, and that effluent monitor sample flow be verified 15 minutes after initiation of the release.

- A. Contrary to the above, on January 5, 1987, procedure DOP 2000-28 was not adhered to for a liquid radwaste release in that the radwaste foreman, designated by the shift supervisor, did not perform valve lineup verifications for Checklists 6 Section A, 9, and 11 of the procedure, although the radwaste foreman signed the checklists indicating that the verifications were performed.

This is a Severity Level IV violation (Supplement I).

- B. Contrary to the above, on January 5, 1987, procedure DOP 2000-28 was not adhered to for a planned liquid radwaste release in that the operator performing the valve lineup checklists failed to properly position two valves, failed to read and comply with a temporary procedure change concerning proper positioning of a third valve, and failed to perform a procedural step which requires effluent monitor sample flow verification 15 minutes after initiating the radwaste release.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to this Office within 30 days of the date of the letter transmitting this Notice. This reply should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the Notice of Violation corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be

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achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

A Bert Davis

A. Bert Davis
Regional Administrator

Dated at ¹³Glen Ellyn, Illinois
this 13 day of ~~October~~ 1989
~~November.~~

SYNOPSIS

After reviewing staff inspection results forwarded to the NRC Office of Investigations (NRC:OI) from the NRC Region III Regional Administrator on April 27, 1987, NRC:OI self-initiated an investigation at the Dresden Nuclear Power Station on September 29, 1987. The decision to self-initiate evolved from allegations that a radwaste foreman willfully failed to perform required independent valve position verifications while signing the checklists that he had done so. It was also discovered that since similar incidents of falsification of verification records were alleged at two other Commonwealth Edison Company (CECo) facilities, there allegedly could have been management involvement in training, approving, or authorizing the falsification of verification records.

The first allegation involved a radwaste foreman who had signed procedure checklists indicating that he had performed independent valve position verifications during a radwaste release on January 5, 1987, when, in fact, he had not verified the valve position lineup. The inexperienced B-operator, who was responsible for positioning the valves, believed that the valves were in the correct position and failed to position three valves correctly. The radwaste foreman admitted that he knew that he was required to independently verify the valve lineup performed by the B-operator, but because he was having personal problems, used careless disregard by not verifying the lineup. He had assumed that the B-operator should have been able to properly perform the lineup.

The second allegation involved CECo management involvement in the training, approving, or authorizing the falsification of verification records. The radwaste foreman stated that he had never been instructed or trained by CECo management that it was allowable to bypass any technical specification procedure or any station operating procedure. There was no indication that other operators or radwaste foremen have ever failed to perform the required valve lineup verifications.

The NRC:OI investigation concluded that the radwaste foreman used careless disregard when he knowingly failed to perform the required independent verification of the B-operator's valve lineup, even though the radwaste release appeared to be proceeding without any problem. The allegation of CECo management involvement was not substantiated.