



Commonwealth Edison

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November 30, 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
Notice of Violation on Unmonitored Liquid
Radioactive Waste Discharge
NRC Docket Nos. 50-237 and 50-249

References (a): February 6, 1987, Enforcement Conference
concerning the Subject event.

(b): W.D. Shafer letter to Cordell Reed
transmitting Inspection Report Nos.
50-237/87003; 50-249/87/003 dated
February 26, 1987.

(c): A.B. Davis letter to Cordell Reed, "Notice
of Violation (NRC Inspection Report Nos.
50-237/87003 and 50-249/87003 dated and NRC
Investigation Report No. 3-87-016 dated
November 1, 1989.

Dear Mr. Davis:

Enclosed is the Commonwealth Edison Company response to two (2) Level IV Violations received in Reference (c). The commitments and corrective actions are consistent with the information contained in References (a) and (b) including an additional effort to assure that the importance and seriousness of integrity in the conduct of nuclear plant activities is re-emphasized to CECO and contractor personnel.

Please contact this office should further information be required.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

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Enclosure

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

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO TWO (2) NOTICES OF VIOLATION

SEVERITY LEVEL IV

VIOLATIONS

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).

DISCUSSION:

Commonwealth Edison agrees with the two violations stated above. The circumstances regarding the January 5, 1987 event were discussed in detail during an enforcement conference held at Region III on February 6, 1987. A brief overview of the information presented at that conference is given as follows.

The Radioactive Waste Equipment Attendant who was assigned to this task was relatively inexperienced, in that he had performed this evolution on only one previous occasion. For the operation of the two (2) valves which were given in the body of the procedure, he attempted to perform/verify proper alignment by opening them physically. As the valves were difficult to turn he assumed they were open. He did not read or follow the instructions of the Temporary Procedure change which required him to open a third valve.

The Radioactive Waste Foreman, in violation of Commonwealth Edison policy, signed the procedure indicating that he had verified the proper valve line-up when, in fact, he had not.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. The Radioactive Waste Foreman was disciplined including both time off without pay and demotion.
2. The Radioactive Waste Equipment Attendant was also given time off without pay.
3. The event was tailgated to all station personnel highlighting the importance to attention-to-detail, the importance of following procedures, the importance of independent verification, and the consequences of falsification of sign-offs.
4. Two of the liquid radwaste discharge valves involved in the event are now permanently locked-open.
5. The revision of DOP 2000-28 in effect on January 5, 1987 was cumbersome to use. After the January 5, 1987 event, the procedure was revised to simplify valving operation needed to accomplish liquid radioactive waste discharges.
6. Additional training is now given to Radioactive Waste Supervisors and Operators. Operators are trained and tested on procedure DOP 2000-28, Radioactive Waste River Discharge, during continuing training. In addition, increased emphasis has been placed on the river discharge evolution during initial training to include a classroom review of the procedure and an in-plant tour to walk down the system and identify all operator checklist items.
7. The Radioactive Waste Supervisors now have a desk in the Radioactive Waste Control Room to provide better supervision and overview of radwaste activities.

All of the above corrective actions were completed by October 1, 1987.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

1. Phase I of the liquid radioactive waste upgrade program (RUP) includes modifications which will enable all liquid radioactive waste discharges to be made from a single tank. This will simplify the valving operation involved in making radioactive waste discharges. Phase I of RUP is currently scheduled to be implemented over the next three years.
2. The importance of independent verification has been emphasized in response to Dresden, other Commonwealth Edison Co. nuclear stations, INPO, and NRC initiatives. This event and other Commonwealth Edison events concerning problems with independent verification are periodically discussed at Station Tailgate sessions. Dresden's Operating Experience Review Program provides an effective mechanism to review INPO, NRC, Industry, and other CECo nuclear station events for inclusion in station tailgate sessions or incorporation into the appropriate personnel training programs.
3. As a result of this event, a corporate memo dated January 13, 1987 was issued to all Station Managers. This memo required that Station Managers re-emphasize the importance of independent verification with all Station department heads and Station employees by March 1, 1987.
4. In response to this notice of violation, Corporate Nuclear Operations Management is issuing an additional memo which will direct all Station Managers and Engineering and Construction (ENC) Managers to re-emphasize the seriousness of willful violations of procedures or policies for the individual and the company. This message will be communicated to all station employees and contractors on site by February, 1990.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The unmonitored discharge was recognized and terminated at 0010 on January 6, 1987.