



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

April 27, 1990

Mr. A. Bert Davis  
Regional Administrator - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Dresden Nuclear Power Station Units 2 and 3  
Response to Level IV Violation Regarding  
Integrated Leak Rate Test (ILRT) Procedures

Reference: NRC Letter, G.C. Wright to C. Reed, "Notice of Violation;  
NRC Inspection Report No. 50-237/90006 (DRSS); 50-249/90005  
(DRSS);" dated March 30, 1990

Mr. Davis:

This letter provides the Commonwealth Edison Company (CECo) response (attached) to the subject violation transmitted by the referenced NRC Inspection Report for Dresden Station. CECO has reviewed the Notice of Violation and agrees that the violation occurred as described. The corrective actions described in the response will bring the Station into compliance and will prevent similar violations from occurring.

Please note that the corrective actions discussion also addresses an unresolved item discussed in the Inspection Report.

Please contact this office should further information be required.

Very truly yours,

T.J. Kovach  
Nuclear Licensing Manager

cc: P. Eng - Project Manager, NRR  
S.G. DuPont - Senior Resident Inspector, Dresden

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

SEVERITY LEVEL IV

VIOLATION

10 CFR Part 50, Appendix B, Criterion V, states in part, that activities affecting quality shall be prescribed by documented instructions, procedures or drawings, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, during the performance of the Integrated Leak Rate Test (ILRT) on February 3 and 4, 1990, the licensee placed the Containment Isolation Valves (CIVs) for the service air system in their test position without use of a procedure or instruction.

This is a Severity Level IV Violation.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Interviews performed with Technical Staff and Operations personnel support the conclusion, with a high confidence level, that the inboard service air line was properly isolated and capped during the ILRT. Therefore, although the valve line-up was not properly performed and verified using a checklist in an approved procedure, the ILRT was adequately performed and the results are valid. This assessment was also expressed by the NRC inspector performing the inspection. Corrective actions, however, were initiated to the ILRT procedure to prevent reoccurrence and are discussed below.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCES

Dresden Technical Staff Surveillance Procedure DTS 1600-7, "Unit 2/3 Primary Containment Integrated Leak Rate Test," will be revised to properly document the service air system valve lineup during the performance of the ILRT. The valve lineup checklists for both Units 2 and 3 will require the service air containment isolation valves to be isolated for the duration of the test. Additionally, the valve lineup checklists will specify a lineup for the service air system which will require the volume upstream of the outboard isolation valve to be vented to atmosphere. This will be accomplished by either: a) isolating service air to the reactor building and venting the system at a service station, or b) if radiological conditions permit, the manual valve just upstream of the outboard isolation valve will be isolated with a manual valve open at a service station between these two valves to serve as a vent path.

Procedure DTS 1600-7 will also be revised to properly document the clean demineralized water valve lineup. The valve lineup checklist will specify that both inboard isolation valves 2(3)-4327-501 and 2(3)-4327-502 are in the closed position for the test. It should be noted however, that the clean demineralized water system will not be vented upstream of the outboard isolation valve 2(3)-4327-500. Consequently, a penalty will be determined from the corresponding Type C test and applied to the final test results. In the unlikely event that any inleakage would occur through these valves to the drywell during the test, a change in drywell sump level would be seen and compensated for in the final test results.

Concerns were also raised regarding some small diameter pneumatic lines which penetrate containment but are not Type C tested. It was agreed that further review of these lines was necessary and that this review would be included in the corporate study on the requirements for Unit 2 and Unit 3 Containment Isolation Valves. However, to avoid further confusion, work requests have been written to cut and cap these lines on both units. This work will be scheduled for the upcoming refueling outage for each unit.

In addition to the changes mentioned above, a full review of DTS 1600-7 will be performed prior to the upcoming Unit 2 refueling outage to ensure all system lineups are properly documented.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Procedure DTS 1600-7 will be revised before the start of the upcoming Unit 2 refueling outage scheduled to begin in September 1990. The small diameter pneumatic lines which penetrate containment will be cut and capped during the upcoming Unit 2 and Unit 3 refueling outages, currently scheduled to begin in September, 1990 and March, 1991 respectively. Accordingly, all actions to achieve full compliance will be implemented by the completion of the upcoming Unit refueling outages.