



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

September 17, 1990

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

Subject: Dresden Station Units 2 and 3
 Response to Inspection Report Nos.
 50-237/90016 and 50-249/90015
NRC Docket Nos. 50-237 and 50-249

Reference: (a) H.J. Miller letter to C. Reed dated
 July 13, 1990.
 (b) H.J. Miller letter to C. Reed dated
 August 16, 1990.

Dear Mr. Davis:

Reference (a) provided the results of the inspection conducted by M. Kopp and other NRC representatives from May 21, through June 21, 1990 of activities at Dresden Station. Reference (b) provided the results of the Enforcement Conference held on August 10, 1990 at the Region III offices. Reference (b) indicated that certain activities appeared to be in violation of NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the Enclosure.

If you have any questions regarding this response, please direct them to this office.

Very truly yours,

T.J. Kovach
 Nuclear Licensing Manager

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Enclosure

cc: NRC Resident Inspector - Dresden
 NRC Document Control Desk

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ENCLOSURE
COMMONWEALTH EDISON COMPANY'S
RESPONSE TO INSPECTION REPORT
Numbers 237/90020 and 249/90020

VIOLATION

10 CFR 50.49, Paragraph (f) requires that each item of electrical equipment important to safety be qualified by testing and/or analysis of an identical item of equipment under identical conditions, or a similar item or under similar conditions with a supporting analysis to show that the equipment to be qualified is acceptable.

Contrary to the above, the following examples of electrical equipment important to safety were not properly qualified by Environmental Qualification (EQ) tests and/or analysis:

- (a) Six splices made of cloth tape wrapped over plastic insulation tape were found installed in the power and control circuits for the HPCI Unit 2 Turbine Steam Supply Isolation Valve.
- (b) Two stub splices with wire nuts were installed on the Reactor Coolant Post-Accident Sample Valve in Unit 3.
- (c) Two Voltrex heat shrink splices were installed in the heat trace circuit for the Hydrogen Analyzer in Unit 2.
- (d) Four Amphenol connectors encapsulated in Voltrex heat shrink tubing were installed in the instrument circuits to the Unit 3 containment High Range Radiation Monitors.

This is a Severity Level IV Violation (Supplement I.D).

VIOLATION

10 CFR 50.49, Paragraph (j), requires a record of qualification be maintained in an auditable form for the entire period in which the covered item is installed in the plant.

Contrary to the above, as of April 1989, the Licensee's EQ files did not contain EQ tests and/or analysis which demonstrated qualification of forty-three (43) General Electric (GE) CR 151 terminal blocks, four (4) GE 2960 terminal blocks, one (1) Cinch terminal block, one (1) Marathon 6000 terminal block, and eleven (11) electrical enclosures installed without the required weepholes in High Energy Line Break (HELB)/radiation areas. In addition, the licensee's EQ file for Marathon terminal blocks failed to identify 64 Marathon 1600/1600EQ terminal blocks which were found installed in EQ circuits in HELB and/or radiation environments.

This is a Severity Level IV Violation (Supplement I.D)

RESPONSE

Commonwealth Edison agrees with the violations as stated in the Notice of Violation. The violations cited were the result of a technical decision to exclude all terminal blocks located outside the Drywell, Steam Tunnel, and Standby Gas Treatment Area during the development of the EQ program at Dresden Station. These terminal blocks were believed to be in a "radiation only" environment, and made of phenolic material which had a higher radiation threshold than the highest radiation level to which they could be exposed in the plant. Based on this decision, complete EQ circuit walkdowns were not conducted during the inception of the Dresden EQ program. However, information received from various internal and third-party audits had led to the conclusion that this decision may have been in error; consequently, the complete "hand-over-hand" circuit walkdowns of all intermediate junction/pull boxes and condulets were initiated by Dresden Station in 1989. The examples given in the violations were discovered during the course of these walkdowns. The circumstances concerning these violations were discussed during the Enforcement Conference held at the Region III Offices on August 10, 1990. The remainder of the Unit 2 walkdowns will be completed by the end of the D2R12 refueling outage (scheduled to begin September 23, 1990) with all potential EQ deficiencies treated consistent with Corrective Action (1) described below. Upon completion of the Unit 2 Walkdowns, LER 249/89005 will be revised to include the final walkdown results.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

1. During the "hand-over-hand" circuit walkdown, as potential EQ deficiencies were discovered, detailed engineering assessments were performed and, as required, the deficiencies were promptly corrected or dispositioned. This approach will continue to be used for any items discovered during the Unit 2 D2R12 refueling outage walkdowns.
2. For the specific examples cited the following actions were taken:
 - a. The four examples of unqualified splices were replaced with qualified Raychem splices.
 - b. For the cases where the terminal blocks had been omitted from the EQ Binders, the Binders were revised on August 9, 1990, to specify the locations of the omitted terminal blocks.
 - c. Regarding junction boxes without weepholes outside containment, a calculation has been performed which confirms that an insignificant amount of moisture accumulation would occur during the environmental conditions to which the enclosures would be exposed. Since these junction boxes located outside containment do not require weepholes, the EQ binders have been revised to clarify that only junction boxes inside the containment require weepholes.
 - d. For the GE, Cinch and Marathon 6000 terminal blocks, the blocks have been replaced with qualified Raychem splices.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCES

The procedures currently in place for controlling new component installations were reviewed and verified that adequate controls are in place to ensure proper EQ identification, qualification, and documentation of newly installed components for EQ applications.

As added assurance, the self-initiated reviews, audits, and studies of the Commonwealth Edison EQ Programs, performed since 1985, will be re-reviewed to clarify that the deficiencies identified have been appropriately dispositioned.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Actions for the previously identified splices and terminal blocks have been completed as stated above. The re-reviews of the self-initiated reviews, audits and studies, will be completed by October 31, 1990. The completion of the circuit walkdowns for Unit 2 and the LER revision will be completed by January 31, 1991.