



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

December 10, 1990

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

Subject: Dresden Station Units 2 and 3
Response to Notice of Violation
Contained in Inspection Report
50-237/90021 and 50-249/90021
NRC Docket Nos. 50-237 and 50-249

- References: (a) M. Ring (NRC) letter to C. Reed (CECo),
dated October 18, 1990.
- (b) Conference Call on November 14, 1990 between
CECo (M. Richter) and NRC (J. Gavula,
D. Danielson).

Mr. Davis:

Reference (a) transmitted Inspection Report 50-237/90021 and 50-249/90021 for Dresden Station. The Inspection Report contained one (1) Notice of Violation regarding the Section XI component support inspection program. Commonwealth Edison Company (CECo) has reviewed the Notice of Violation and agrees that the violation occurred as described. The Attachment to this letter presents CECo's response to the violation, and describes corrective actions which are being taken to prevent similar occurrences.

Reference (a) also requested that historical operability evaluations, and the loads which should be considered for these evaluations, be addressed in this response. As agreed upon in the Reference (b) teleconference, CECo will address this subject with your staff in a conference call prior to the submittal of a formal response. At this time, CECo expects to be scheduling this conference call during the week of December 10, 1990. CECo appreciates the opportunity to discuss this matter with your staff prior to the submittal of a formal response.

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Additionally, an extension to the response due date was requested and granted by your staff in the Reference (b) teleconference.

Please direct any questions or comments on this response to this office.

Respectfully,

Milton H. Richter

T.J. Kovach
for Nuclear Licensing Manager

Attachment: Commonwealth Edison Company
Response to Notice of Violation
(Inspection Report 50-237/90021 and 50-249/90021)

cc: B. Siegel - NRR Project Manager
NRR Document Control Desk
D. Hills - Senior Resident Inspector, Dresden

MR/1mw
ZNLD606/21

ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

(INSPECTION REPORT 50-237/90021 and 50-249/90021)

VIOLATION

10 CFR Part 50, Appendix B, Criterion XVI, as implemented by CECO Topical Report CE-1A, "Quality Assurance Program for Nuclear Generating Stations," and CECO Quality Assurance Manual, Nuclear Generating Stations, "Quality Requirements," requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, corrective actions taken to address the findings from the Commonwealth Edison Quality Assurance Audit 12-88-33, dated September 14, 1988, were inadequate in the following areas:

- a. The corrective actions did not assure that Deficiency Reports were initiated for component supports that required engineering evaluation in accordance with SPPM VT-3/4-1.
- b. The corrective actions did not provide specific criteria for evaluations of component supports requiring corrective action when operability of the system was in question.

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

RESPONSE

Commonwealth Edison Company (CECO) agrees with the violation as stated in the Notice of Violation. The procedure revision to Dresden Technical Procedure DTP-2 (Inservice Inspection Plan) to address the audit finding was too narrow in scope since it only required a Discrepancy Record to be initiated, and an engineering evaluation to be performed, when the as-built support configuration would not, or could not, be returned to the designed configuration. Consequently, the procedure did not provide assurance that Discrepancy Records would be initiated for inoperable supports; nor did the procedure provide guidance for the initiation and performance of engineering evaluations when the discrepant support condition could impact the operability of the system.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

To address the documentation concern identified in the inspection report during the current Unit 2 refueling outage (Fall 1990), a Discrepancy Record was generated to document those supports identified to have a discrepant condition which could impact their design function. For those supports, the Discrepancy Record also documented the results of the engineering evaluations which were performed and the corrective actions which were implemented.

Since the evaluations performed for the current Unit 2 refueling outage (which assessed the potential damage to the piping system as a result of the discrepant support condition) were based on actual operating history or loads, the corporate Nuclear Engineering Department will review the Discrepancy Record for the outage to determine if any of the discrepant support conditions could have had a design basis impact. Any discrepant support condition which could have had a design basis impact will be reported in a Licensee Event Report. The Discrepancy Record review will be completed by January 15, 1991.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NON-COMPLIANCES

Dresden Technical Procedure DTP-2 (Inservice Inspection Plan) will be revised to incorporate guidance, which will be provided by the corporate Nuclear Engineering Department, for the determination of discrepant support conditions which must be evaluated under the Discrepancy Record process, and receive an engineering evaluation. The Discrepancy Record process will document not only the disposition of the discrepant condition, but also the results of the evaluation.

For the performance of the engineering evaluations, an Engineering and Construction Department procedure is currently being developed which will provide guidance for the evaluation of piping and support systems when discrepancies (e.g., missing or inoperable supports, broken welds or supports, etc.) are identified. This procedure will address operability and reportability considerations which need to be taken into account when performing evaluations for discrepant support conditions identified during the Inservice Inspection.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Engineering and Construction Department procedure which will address the evaluation of piping and support systems will be approved by February 15, 1991, prior to the start of the upcoming Dresden Unit 3 refueling outage.

The revision to station procedure DTP-2 will be completed prior to the start of the upcoming Unit 3 refueling outage scheduled to begin in March 1991.