



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

DCD

February 15, 1991

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 Notice of Violation Associated
with Inspection 50-237/90027; 50-249/90026
NRC Docket No. 50-237 and 50-249

Reference: W.D. Shafer letter to Cordell Reed dated
January 17, 1991 transmitting NRC Inspection
Report 50-237/90027; 50-247/90026

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. The violation involved failure to report to the NRC an Engineered Safety Feature actuation in accordance with 10 CFR 50.72.

If your staff has any questions or comments concerning this letter, please refer them to Rita Radtke, Compliance Engineer at 708/515-7284.

Very truly yours,

T. J. Kovach
Nuclear Licensing Manager

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

RR:TK:lmw
ZNLD742/17

IEO 1
//

FEB 19 1991

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Nuclear Power Station

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

During an NRC inspection conducted on November 17 through December 29, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

10 CFR 50.72(b)(2)(ii) requires the NRC to be notified within four hours of the occurrence of any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF).

Contrary to the above, the unexpected closure of several Unit 2 Group II primary containment isolation valves upon lifting of an electrical lead during post-maintenance testing on December 8, 1990, constituted an automatic actuation of an ESF and the NRC was not notified of the occurrence.

This is a severity level IV violation (Supplement I).

DISCUSSION

Dresden Station management carefully reviewed the circumstances surrounding the closure of several of the Group II isolation valves. The valve closures were not the result of a Group II signal, real or spurious. Neither channel of the Group II isolation logic circuitry actuated. The spurious closure of the valves was caused by de-energizing of the seal-in relays associated with several of the Group II valves.

Page 13 of NUREG-1022, "Licensee Event Report System," reads as follows:

"Actuation" of multichannel ESF Actuation Systems is defined as actuation of enough channels to complete the minimum actuation logic (i.e., activation of sufficient channels to cause activation of the ESF Actuation System).

As neither Group II isolation channel had actuated, it was determined that the closure of these few valves did not constitute an ESF actuation.

Discussions were held with the Resident Inspectors concerning the reportability of this event. The Inspectors believed that the event was reportable, citing an internal NRC memorandum which discussed another licensee's proposal to define valid ESFs as resulting only from valid ESF signals. The focus of this memorandum defines an ESF actuation as the actuation of a component of an ESF system--in Dresden's case the closure of several Group II isolation valves. Commonwealth Edison is now aware of this position as to what constitutes an ESF actuation. By the time these discussions were held, several days had passed and the four hour reportability window had expired.

An informal survey was conducted of other Region III utilities to determine how the Dresden event would have been reported. Responses included both reportable and non-reportable. We suggest a continuing dialog with the NRC to share appropriate information (such as the internal NRC memorandum) in order to further refine our reportability determinations.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Following discussions with the NRC on ESF actuations, an Emergency Notification System (ENS) report was made in accordance with 10 CFR 50.72(b)(2)(ii) on February 4, 1991.

CORRECTIVE ACTIONS TAKEN TO PREVENT FURTHER NONCOMPLIANCE

To assist in making 10 CFR 50.72 reportability determinations, a memorandum will be issued by February 19, 1991 to the operating shift personnel providing this broader guidance on what constitutes an ESF. This guidance will be incorporated into an appropriate station procedure by May 31, 1991.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on February 4, 1991 when all reportability requirements were met.

ZNLD742/18