



Commonwealth Edison

Dresden Nuclear Power Station
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Telephone 815/942-2920

February 25, 1991

EDE LTR #91-122

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Licensee Event Report #91-003-0, Docket #050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(i)(B).

E. D. Eenigenburg
Station Manager
Dresden Nuclear Power Station

EDE/ade

Enclosure.

cc: A. Bert Davis, Regional Administrator, Region III
File/NRC
File/Numerical

(ZDVR/141)

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2/3	Docket Number (2) 0 15 10 10 10 12 13 17	Page (3) 1 of 0 4
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Title (4) **Omission of Liquid Radwaste Discharge Composite Analysis**
Due to Management Deficiency

Event Date (5)				LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)	
0	2	0	1	9	1	9	1	1			
				0	0	13					
						0	0	0	2	2	
						15	9	1	Dresden Unit 3	0 15 10 10 10 12 14 19	
									N/A	0 15 10 10 10 1 1 1	

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)					
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 20.405(a)(1)(v)
	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.36(c)(2)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)
	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 73.71(c)	Other (Specify in Abstract below and in Text)			

LICENSEE CONTACT FOR THIS LER (12)

Name Jeffrey Boyar, Regulatory Assurance Engineer	TELEPHONE NUMBER
Ext. 2707	AREA CODE 8 1 5 9 4 2 -2 9 12 10

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> Yes (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> X	<input type="checkbox"/> NO
	Expected Submission Date (15)	Month Day Year

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

At 1500 hours on February 1, 1991 with Units 2 and 3 in cold shutdown, it was discovered that the composite Radwaste River Discharge sample for September 2 through October 3, 1990 was not submitted to the vendor for analysis of gross alpha activity, Fe55, Sr89 and Sr90. This composite sample is required by Technical Specification Table 4.8.3. The cause of this event was attributed to a management deficiency concerning implementation of sample preparation requirements. Procedure deficiency regarding sample shipment preparation was a contributing cause. This event was initially reviewed with the personnel involved and will be reviewed with all Chemistry Department personnel. The Chemistry Department has also implemented improved administrative controls regarding management tracking and review of these activities.

The safety significance of this event is minimal since all Radwaste tanks discharged during September, 1990 were sampled and analyzed for gross activity, and gamma isotopic Maximum Permissible Concentration (MPC) fractions were verified to be satisfactory.

A previous event involving a Chemistry surveillance was reported by LER 89-017-0 on Docket Number 050237.

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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor -2527 MWT rated core thermal power.

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXX).

EVENT IDENTIFICATION:

Omission of Liquid Radwaste Discharge Composite Analysis Due to Management Deficiency

A. CONDITIONS PRIOR TO EVENT:

Unit(s): 2(3) Event Date: February 1, 1991 Event Time: 1500 Hours
 Reactor Mode(s): N(N) Mode Name: Shutdown(Shutdown) Power Level(s): 0(0)%
 Reactor Coolant System (RCS) Pressure(s): 0(0) psig

B. DESCRIPTION OF EVENT:

On February 1, 1991 at 1500 hours with Unit 2 and Unit 3 in the Shutdown mode, the September 2 through October 3, 1990 Composite Radwaste River Discharge sample was discovered to have not been submitted for gross alpha, Fe55, Sr89 and Sr90 analysis. The discovery was made by a Health Physicist while compiling the Semi-Annual Radioactive Effluent report for July through December, 1990.

Dresden Chemistry Procedure (DCP) 1018-03, Radioassay Shipments, was performed on September 26, 1990. However, the shipment that was prepared contained composite radwaste river discharge samples for the two previous months and not for the current month. When DCP 1018-03 was performed again on October 31, 1990 the composite river discharge sample for the month of October was prepared but not for the month of September. In February of 1991, when this event was discovered, the September, 1990 sample had already been discarded. It should be noted that during October, 1990 Chemistry management observed and corrected deficiencies involving documentation of sample shipments. However, the event described in this report had occurred previously and thus was not prevented by the October, 1990 corrective actions. Technical Specification Table 4.8.3 requires collection and analysis of this monthly composite sample.

There were no related maintenance activities or testing in progress at the time of this event. No inoperable systems or components contributed to this event.

C. APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the Technical Specifications within 30 days of the event. The root cause of this event was determined to be a management deficiency concerning the implementation of DCP 1018-03. Procedure deficiency regarding sample shipment preparation was a contributing cause. DCP 1018-03 governs preparation of samples for shipment to offsite laboratories for gross alpha, Fe55, Sr89 and Sr90 analyses. Review of DCP 1018-03 documentation for the period in question revealed that the proper samples had been collected, but the river discharge composite sample was not shipped to the offsite laboratory. Management review of the DCP 1018-03 data sheet did not identify the failure to include this sample in the shipment.

Scheduling of these composite sampling activities is governed by checklist procedures which are tailored to the daily duties of each Chemistry Technician. These procedures were recently developed as part of an improvement program, and were implemented in mid 1990 to provide positive controls over Chemistry surveillance scheduling following a previous event (refer to Section F below).

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Investigation concluded that the governing checklist procedure properly triggered the sample collection and shipment preparation activities; however, the sample in question was not properly included in the shipment. It was determined that the sample preparation activity had been noted as not performed during the regular scheduled shift, and was therefore re-assigned for completion on a later shift. Subsequent completion of the sample preparation activity was found to be inadequate in that one sample was not included. Further review of these surveillance procedures concluded that enhancements were needed in the area of documentation for re-assigned tasks and independent management review of incomplete or re-assigned items. It was also determined that other station administrative procedures concerning surveillance control were in need of clarification in order to reflect the recent implementation of the new Chemistry Surveillance Procedures.

D. SAFETY ANALYSIS OF EVENT:

The safety significance of the event is minimal since all Radwaste tanks discharged during September, 1990 were sampled and analyzed for gamma isotopic Maximum Permissible Concentration (MPC) fractions and were verified to be satisfactory in accordance with Dresden Operating Procedure (DOP) 2000-28, Radioactive Waste Discharges. Tritium, gross alpha, Fe55, Sr89 and Sr90 concentrations were within expected ranges for Radwaste tanks discharged in August and October, 1990. Furthermore, since gamma isotopic and tritium activities were analyzed and verified within expected ranges during September, 1990 there is no reason to suspect that the September, 1990 gross alpha, Fe55, Sr89 and Sr90 levels were outside expected ranges. If this event had occurred under a more severe set of initial conditions, the safety consequences would still have been minimal because analyses required by DOP 2000-28 would have identified the increased levels of activity and would have prohibited the discharge.

E. CORRECTIVE ACTIONS:

The following corrective actions were initiated regarding this event.

1. A Regulatory Assurance investigation was completed concerning this event.
2. This event was reviewed with the personnel involved and will also be reviewed in a departmental meeting with Chemistry Department personnel by April 1, 1991 (237-200-91-02201).
3. The Chemistry Department has implemented a change to DCP 1018-03 to include a detailed listing of all samples which must be included in shipments to the offsite laboratory. This change also implemented a program whereby duplicate liquid samples will be stored on-site until the off-site laboratory results are received and reviewed.
4. The Chemistry Department has implemented a change to Dresden Administrative Procedure (DAP) 16-5, Conduct of Chemistry, to include tracking and review of all routine surveillance activities not completed during the assigned work shift by the Chemistry Supervisor or his designee. Appropriate Dresden Chemistry Surveillance (DCS) procedure changes were also implemented to reflect this requirement.
5. Changes to DAP 9-11, Procedure Usage and Adherence, and DAP 11-2, Surveillance and Periodic Test Scheduling Program, to clarify the requirements concerning control and review of Chemistry Surveillances have been implemented.
6. The Chemistry Department submitted an addition to the General Surveillance (GSRV) database to provide redundant tracking of sample preparation activities.

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- The Health Physics Department will develop a procedure to track sample shipment after sample preparation by the Chemists. This procedure will provide a checklist of samples required to be shipped, thus creating redundant control of the sample shipment activity and will be completed by April 1, 1991 (237-200-91-02202).

F. PREVIOUS OCCURENCES:

A previous event involving a Chemistry Department Surveillance is listed below.

LER/Docket Numbers Title

89-017-0 Loss of Batch Waste Release Tank Composite Sample

The May 1989 Batch Waste Release Tank composite sample for Tritium and gross alpha was inadvertently discarded before a sample aliquot could be sent off-site for analysis. The cause of the event was attributed to management deficiency on the part of the Chemistry Department personnel. Corrective actions included improved administrative controls.

G. COMPONENT FAILURE DATA:

This event did not involve component failure. Therefore, this section is not applicable.