



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 27, 1991

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

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Notice of Violation Associated
with Inspection 50-237/91004; 50-249/91004
NRC Docket Nos. 50-237 and 50-249

Reference: M.A. Ring letter to Cordell Reed dated
March 5, 1991 transmitting NRC Inspection
Report 50-237/91004; 50-249/91004.

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 conduct a surveillance test for the linear thermal detectors located in specified fire zones.

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
Document Control Desk (Washington, D.C.)

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RESPONSE TO NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Nuclear Station
Units 2 and 3

Docket Nos. 50-237; 50-249
Licenses No. DPR-19; No. DPR-25

As a result of the inspection conducted January 22-29, and February 13, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C, (1990) (Enforcement Policy) the following violation was identified:

Amendment No. 106 to Provisional Operating License No. DPR-19 (Unit 2) and Amendment No. 101 to facility Operating License No. DPR-25 (Unit 3) requires the licensee to maintain in effect all provisions of the approved fire protection program for Dresden Unit 2 and Unit 3.

As part of the approved program, the licensee committed to install and maintain the fire detection and alarm system in accordance with the National Fire Protection Standard No. 72E, which required the linear thermal detectors to be tested every six months.

Contrary to the above, the licensee failed to conduct the six month surveillance test on the linear thermal detectors in safety-related fire zones 1.1.1.1 and 1.1.2.1 since July 31, 1989.

This is a Severity Level IV violation (Supplement 1)

DISCUSSION

In June 1989, Dresden Station began development of a surveillance procedure to conduct six month surveillance testing on the linear thermal detectors located in fire zones 1.1.1.1 and 1.1.2.1. Work request D84775 and a special procedure were written and the surveillance was performed on July 31, 1989 by the Electrical Maintenance Department.

A permanent procedure was then drafted and routed for Station preliminary review. This permanent procedure included a provision to incorporate the new surveillance in the Dresden Station General Surveillance (GSRV) computer program upon issuance of the new procedure. The GSRV computer program is used to notify cognizant personnel of pending due dates for various surveillance tasks. However, due to significant delays in the preliminary review process, the procedure was not completed and issued within the time frame originally anticipated. As a result, the GSRV computer program was never updated and two surveillance tests were missed.

During the inspection on January 22, 1991, the two missed surveillances were identified. The missed surveillances resulted from an apparent deficiency in Dresden Station's process for initiating new procedures. No mechanism existed to guarantee that surveillances would be conducted if necessary prior to issuance of a permanent station procedure.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. Work Request D98032 to perform the required surveillance test on the linear thermal detectors in safety-related fire zones 1.1.1.1 and 1.1.2.1 was initiated and completed on January 27, 1991, and the results were found to be satisfactory.
2. A request to include this surveillance immediately in The Dresden Station General Surveillance Program (GSRV) was initiated on March 12, 1991 (GSRV #D00Z418307-D12-01).
3. The permanent station procedure, Dresden Fire Protection Surveillance (DFPS) 4183-7, entitled "Linear Thermal Detection Semi-Annual Surveillance" will be approved by April 5, 1991.

CORRECTIVE ACTIONS TAKEN TO PREVENT FURTHER NONCOMPLIANCE

Dresden Administrative Procedure (DAP) 9-2, "Procedure and Revision Processing," will be revised by June 30, 1991 to add a requirement for the procedure originator to contact the Department Surveillance Coordinator to initiate requests for any new surveillances or existing surveillances where the interval is being changed, to be included in The Station General Surveillance Program (GSRV) at the beginning of the procedure writing process rather than wait for issuance of the procedure if a commitment is involved. This new mechanism will ensure that any surveillance procedures are being written or revised.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 27, 1991 when the surveillance for Fire Zones 1.1.1.1 and 1.1.2.1 was conducted and on March 12, 1991 when a request was submitted to include this surveillance in the Dresden Station General Surveillance Program.