



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

January 7, 1992

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3  
Response to Open Items Associated with  
Inspection Report 50-237/91029; 50-249/91031  
NRC Docket Numbers 50-237 and 50-249

References: (a) G. C. Wright letter to Cordell Reed dated  
December 10, 1991 transmitting NRC Inspection  
Report 50-237/91029; 50-249/91031

Enclosed is Commonwealth Edison Company's (CECo) response to the  
subject Open Items which were transmitted with the Reference (a) letter and Inspection  
Report. The Open Items related to issues involving the Dresden Emergency Operating  
Procedures.

If there are any questions or comments regarding this response, please  
contact Denise Saccomando, Compliance Engineer, at 708/515-7285.

Very truly yours,

T.J. Koyach  
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III  
B. L. Siegel, Project Manager, NRR  
W. G. Rogers, Senior Resident Inspector, Dresden

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COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT

50-237/91029 and 50-249/91031

Open Item 4.a.(1) part I:

During a walkdown of DEOP 100, Reactor Control, a Senior Reactor Operator (SRO) was provided with the necessary data to determine if the Emergency Core Cooling System (ECCS) Net Positive Suction Head (NPSH) requirements were met. The operator incorrectly applied the data to the ECCS NPSH Limit curves. These curves were recently included in a requalification training cycle. Based on these facts, a potential training weakness was identified and further investigation by the licensee was required to determine the extent of the problem. Upon completion of the investigation, the licensee agreed to take appropriate actions to resolve the issue.

The DEOP coordinator and the requalification training supervisor conducted an impromptu survey of several licensed operators to evaluate whether ECCS NPSH Limit determinations could be appropriately made. The survey consisted of requesting the operator to determine if any of the ECCS pumps in operation were exceeding the ECCS NPSH Limit by providing the curves, data and then evaluating the operators results. The survey was completed by November 12, 1991. Survey results indicated that previous training was sufficient, but some confusion was exhibited by the operators when trying to perform the determination. It was indicated that the previous training did not require the operator to perform the determination on an exam. The refresher training on the ECCS NPSH Limit curves has now been provided to the operators. This refresher training does require the operator to perform the ECCS NPSH limit determination, and the licensed operator NRC requalification exam bank now contains questions requiring the operator to perform this determination. Make up training on this subject is being provided via the Cycle 8-91 reading package.

Open Item 4.a.(1) part II:

A review of the source documents utilized in the calculations of the ECCS NPSH Limit curves assumed one Low Pressure Coolant Injection (LPCI) pump in service and did not allow for the increased head loss in the common section of the suction piping to the two LPCI pumps. The licensee was addressing this issue by reviewing the calculations to determine if the increased head loss would affect the accuracy of the ECCS NPSH Limit curves.

The DEOP coordinator is reviewing the source documents and engineering calculations utilized in the determination of the ECCS NPSH Limit Curves. Upon completion of this review, the DOP coordinator will determine the affect the this discrepancy on existing DEOPs and generate any necessary procedure changes. The review and the subsequent corrective actions are expected to be completed by July 31, 1992.

Open Item 4.a.(2) part I:

The maximum safe radiation levels for the Reactor Building, specified in DEOP 300-1 Secondary Control, are set at 150 mr/hr. The generic values specified in the EPGs were set at 1250 mr/hr. Based on the EPG Appendix A definition of the Maximum Safe Operating Radiation level, the EOP requirement for a manual scram prior to any area reaching this level, and the EOP requirement for an emergency depressurization when two or more areas reach this level, the inspectors questioned whether these values really posed a direct and immediate threat sufficient to warrant the severe transients of a scram and emergency depressurization. The licensee agreed to investigate into whether the maximum safe radiation levels specified were appropriate.

The DEOP coordinator will perform a review of the source documents and methodology utilized in the generation of the Maximum Safe Area Radiation Levels specified in DEOP 300-1 and determine if any changes to the existing DEOPs will be required. The review and any necessary changes to the DEOPs are expected to be completed by August 31, 1992.

Open Item 4.a.(2) part II:

In DEOP 300-1, the Maximum Normal Temperatures and Maximum Safe Temperatures were set at 150 deg F and 180 deg F, respectively. The small difference between the two values provided limited opportunity for operating personnel to implement remedial actions for a primary system leak prior to initiating a scram or emergency depressurization. The licensee agreed to investigate this issue further.

The DEOP coordinator will perform a review of the source documents and methodology utilized in the generation of the Maximum Safe Temperatures specified in DEOP 300-1 and determine if any changes to the existing DEOPs will be required. The review and any necessary changes to the DEOPs are expected to be completed by August 31, 1992.

Open Item 4.b:

There are several instances in which there are differences between the Plant Specific Technical Guidelines (PSTGs) and the DEOP flowcharts that are not documented or identified during the licensee's Verification and Validation of the DEOPs. These changes involved changes in sequence, changes in logic and relocation of steps to other DEOPs. Although these changes generally enhanced the useability of the flowcharts, they were not documented in the PSTG or in the Roadmap document, PSTG to flowchart translation document. The concern over these differences was for assurance that the operational strategy of the PSTGs and EPGs were not compromised and that tighter control over procedural maintenance and revision was maintained. The licensee agreed to consider documenting these differences in the Roadmap.

The DEOP coordinator will perform a review of the NRC PSTG/Flowchart Consistency concerns specified in Open Item 4.b and those associated examples in Appendix B. The review and any necessary changes to the respective administrative documents or DEOPs are expected to be completed by November 30, 1992.

Open Item 4.c:

The licensee's philosophy of entering and exiting the DEOPs appears to be contrary to the symptomatic approach utilized in the EOPs. In general, this philosophy allowed operator judgment to determine when the DEOPs are needed to be entered and executed; whereas, the EPGs require entry into the DEOPs any time an entry condition is met. Exiting the DEOPs should require satisfying a predetermined and defined set of criteria. The licensee agreed to re-evaluate the Dresden philosophy on DEOP usage, and to more clearly define expectations for usage to the operations staff.

The DEOP coordinator and associated station personnel will perform a review of the station philosophy of use of DEOP's. The personnel will review all pertinent and available information on entering and exiting the DEOPs. Upon completion of this review, the DEOP coordinator will make the necessary changes to applicable station procedures, and the training department will ensure that the operators are properly trained on entering and exiting the DEOPs. The review, any necessary procedural changes and the subsequent operator training are expected to be completed by June 30, 1992.