



UNITED STATES
ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

January 20, 1972

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Assistant to the President
P. O. Box 767
Chicago, Illinois 60690

Docket No. 50-237
Docket No. 50-249

Gentlemen:

This refers to the inspection conducted by Messrs. Maura and Jordan of this office on December 9, 1971, and by Messrs. Dance and Maura of this office on December 13 through 17, 1971, of operations at Dresden Units 2 and 3, authorized by AEC Operating Licenses No. DPR-19 and DPR-25, and to discussions of our findings held by Messrs. Dance and Maura with Messrs. Hoyt, Worden, and Morris, of your staff at the conclusion of the inspection.

Areas examined during this inspection included Unit 2-3 reactor scram test results, Unit 2-3 control rod drive test results, Unit 2 future outage plans, Unit 3 cleanup system pipe movements, Unit 2-3 turbine blade inspection plans, and plant review activities performed by the Nuclear Review Board and the Station Review Board. In addition to these areas, the inspectors examined reactor operating events, proposed corrective actions and startup plans associated with the unplanned shutdown and safety valve actuation event at Unit 3 which occurred on December 8, 1971. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspectors.

The inspectors also examined actions you have taken with respect to the development of maintenance procedures, Quality Assurance Manual and supporting Quality Assurance/Quality Control procedures that were identified in your letter dated July 12, 1971. We noted that the estimated completion date for these procedures was not achieved. It is our understanding that you intend to complete the Quality Assurance Manual as well as the supporting procedures, which will be applicable for all three Dresden units, in the near future. We request that you provide us the revised dates these items will be completed. We will examine this matter further during subsequent inspections.

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We also noted during this inspection that you have completed the special measurements of the Unit 2-3 chimney effluents and have tested the reactor building effluent monitor as referenced in our letter of August 2, 1971. We have no further questions on these subjects at this time.

For your information, the evaluation of the scram reset circuitry, identified in our letter of August 30, 1971, has been concluded by Compliance Headquarters. The results of this evaluation have been forwarded to the Division of Reactor Licensing for further consideration with respect to the criteria of IEEE-279 which are not fulfilled.

During this inspection, it was found that certain of your activities appeared to be in noncompliance with AEC requirements. The items and references to the pertinent requirements are listed in the enclosure to this letter. We note that item 4 of the enclosure was corrected prior to the December 9, 1971, inspection, and that the matter has been reported to the Division of Reactor Licensing. No reply to this item is required. Please provide us, in writing, within 20 days, with your comments concerning the remaining items, any steps which have been or will be taken to correct them, any steps that have been or will be taken to prevent recurrences, and the date all corrective actions or preventive measures were or will be completed.

Based on our examination of the safety valve actuation event, the following items have been referred to Compliance Headquarters for consideration: (1) a design modification to provide for automatic initiation of torus sprays, and (2) installation of instrumentation to improve monitoring of reactor conditions during transient operation. You will be informed of the results of our further evaluation of these items.

It is our understanding from discussions with your site management that the following actions have been or will be pursued:

1. Modifications to the feedwater system are under review to improve performance of the system. Modifications to improve reliability of the air operated regulator valves in the feedwater system were completed prior to reactor startup.
2. Frequency of testing the torus to drywell vacuum breakers to confirm proper operation will be increased.

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3. A final report of the occurrence which will discuss the safety valve relieving mechanism will be submitted to the Division of Reactor Licensing.

We will examine your action on these matters during subsequent inspections. Should you have any questions concerning this inspection we will be happy to discuss them with you.

Sincerely yours,

Boyce H. Grier
Regional Director

Enclosure:
Description of Items of
Noncompliance

cc: W. P. Worden, Plant Superintendent

bcc: J. G. Keppler, CO
A. Giambusso, CO
L. Kornblith, CO
R. H. Engelken, CO
P. A. Morris, DRL
CO Files
DR Central Files
PDR
NSIC
R. L. Shannon, DTIE

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ENCLOSURE

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Certain activities under your license appear to be in noncompliance with AEC license requirements as listed below.

1. Section 6.2.A of the facility Technical Specifications states, "Detailed written procedures, including applicable check-off tests and instructions, covering areas listed below shall be prepared, approved as specified in Section 6.1, and adhered to for operation of all systems and components involving nuclear safety."

Contrary to the above, the procedure steps listed below were not adhered to subsequent to the Unit 3 feedwater transient experienced on December 8, 1971.

- a. Feedwater regulator valve lockout was not reset as required by Reactor Operating Procedure 600-AN-I, Section F.1.
 - b. Feedwater pump was not tripped when reactor water level exceeded 60 inches as required by Reactor Operating Procedure 600-AN-I, Section I.
 - c. Torus spray was not initiated when drywell pressure rose above 2 psig as required by Reactor Operating Procedure 1600-AN-II, Section E.
2. Section 6.1.E.1.d(1) states that the Nuclear Review Board (NRB) responsibility is to "Review and approve for submittal to the AEC proposed changes to the station operating license including technical specifications, unreviewed safety questions, and Safety Analysis Report."

Section 6.1.E.2.d(4) states that the Station Review Board (SRB) responsibility is to "Review and approve for submittal to NRB proposed changes to technical specifications, license, and Safety Analysis Report."

Contrary to the above, the NRB had not reviewed and approved Proposed Change No. 16 to DPR-19 and Proposed Change No. 8 to DPR-25 involving the turbine control valve fast closure scram, surveillance of the Intermediate Range Monitors, and the addition of a rod block for the APRM and IRM, prior to submittal to the

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AEC, and the SRB had not reviewed and approved the proposed changes prior to submittal to the NRB.

3. Section 4.3.C.2 of the facility Technical Specifications states, "At 16 week intervals, 50 percent of the control rod drives should be tested as in 4.3.C.1 so that every 32 weeks all of the control rod drives shall have been tested."

Contrary to the above, 50 percent of the control rod drives for Unit 3 were not scram tested between July 20, 1971, and unit shutdown date of December 8, 1971, an interval in excess of 16 weeks.

4. Section 3.7.C.1 of the facility Technical Specifications states, "Secondary containment integrity shall be maintained during all modes of plant operation . . ."

Contrary to the above, secondary containment integrity was not maintained during a 15 hour period on October 20-21, 1971, during Unit 2 operations.

We note this matter was reported to the Division of Reactor Licensing in your Hoyt to Morris letter of October 28, 1971.