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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

AUG 29 1975

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

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

Gentlemen:

This refers to the inspection conducted by Mr. T. L. Harpster of this office on July 21 and 22, 1975, of activities at the Dresden Station authorized by NRC Licenses No. DPR-19 and No. DPR-25, and to the discussions of our findings with Messrs. Butterfield and Jurecki at the conclusion of the inspection. A meeting, attended by Mr. Palmer and other members of the Commonwealth Edison Production and Engineering staff, and Messrs. Harpster, Little and Knop of this office, was held on August 14, 1975, at the Commonwealth Edison Company offices to discuss the findings of this inspection. The inspection was conducted in connection with our headquarters review and evaluation of the findings of the May 12, 1975, Dresden inspection.

A copy of our report of this inspection is enclosed and identifies the areas examined. Within these areas, the inspection consisted of interviews with Commonwealth Edison personnel and observations by the inspector.

No items of noncompliance with NRC requirements were identified within the scope of this inspection; however, certain activities identified during this inspection appear to be a deviation from Commonwealth Edison Standards. The item is identified under Other Significant Findings in the Summary of Findings section of the enclosed inspection report. Please advise us in writing within 20 days of the corrective action you have taken or plan to take, showing the estimated date of completion, with regard to this deviation.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this notice, the enclosed inspection report, and your response to this notice will be placed in the NRC's Public Document Room. If this report contains any information that you or your contractors believe to be proprietary, it

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Commonwealth Edison Company

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is necessary that you make a written application to this office, within twenty days of your receipt of this notice, to withhold such information from public disclosure. Any such application must include a full statement of the reasons for which it is claimed that the information is proprietary, and should be prepared so the proprietary information identified in the application is contained in a separate part of the document. Unless we receive an application to withhold information or are otherwise contacted within the specified time period, the written material identified in this paragraph will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations Branch

Enclosure:

IE Inspection Reports No.
050-237/75-21 and No.
050-249/75-18

cc w/encl:

B. Stephenson
Station Superintendent

bcc w/encl:

PDR
Local PDR
NSIC
TIC
Anthony Roisman, Esq., Attorney

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-237/75-21
IE Inspection Report No. 050-249/75-18

Licensee: Commonwealth Edison Company
P.O. Box 767
Chicago, Illinois 60690

Dresden Nuclear Power Station,
Units 2 and 3
Morris, Illinois

Licenses No. DPR-19
and No. DPR-25
Category: C

Type of Licensee: GE BWR 809 MWe

Type of Inspection: Special, Announced

Dates of Inspection: July 21-22 and August 14, 1975

Principal Inspector: T. L. Harpster

T. L. Harpster

8/26/75
(Date)

Accompanying Inspector: None

Other Accompanying Personnel: None

Reviewed By: *W. S. Little Sr.*
W. S. Little, Senior Inspector
Nuclear Support Operations Branch

8/27/75
(Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on July 21, 22, and August 14 (75-21) (75-18): Followup inspection of actions taken with respect to IE Bulletins 75-04 and 75-04A; meeting with members of Commonwealth Edison Production and Engineering staff to discuss the schedule for installation and repair of fire stops. One deviation was identified concerning licensee commitments to seal electrical penetrations.

Enforcement Items

None.

Licensee Action on Previously Identified Enforcement Items

Not inspected.

Other Significant Items

A. Systems and Components

None.

B. Facility Items (Plans and Procedures)

None.

C. Managerial Items

None

D. Noncompliance Identified and Corrected by Licensee

None.

E. Deviations

Penetrations were not properly sealed, and fire stops were not installed, contrary to the requirements of the following Commonwealth Edison standards:

1. Cable pan fire stop and air seal through wall (Sargent and Lundy STD-EA-175)
 2. Fire stop in cable riser (Sargent and Lundy STD-EA-176)
 3. Control board cable entrance seal (Sargent and Lundy STD-EA-179)
 4. Method of sealing ducts for all types of cable (C-5192)
- F. Status of Previously Reported Unresolved Items
- None.

Management Interview

- A. The following subjects were discussed at the conclusion of the inspection on July 22, 1975 with Messrs. Butterfield and Jurecki.
1. The inspector summarized the findings of the visual inspection of penetrations. The inspector stated that several instances of failure to meet CE requirements regarding firestops and seals for electrical penetrations had been identified, and that this would be considered a deviation.

The licensee stated that the Station Nuclear Engineering Department was developing a repair schedule in response to the initial firestop inspection and the actions requested in IE Bulletins 75-04 and 75-04A. (Paragraph 2, Report Details.)
 2. The inspector stated the combustible material had been removed from the Auxiliary Electric Room since the previous inspection, however combustible material was still found at various locations in the plant. In addition, rags found in two secondary containment penetrations during the previous inspection had not been removed.

The licensee stated that they were inspecting the plant and removing combustible materials from fire hazard areas. (Paragraph 3, Report Details)
 3. The inspector stated that the item regarding cable separation will continue to remain unresolved pending further investigation. (Inspection Report 50-10/75-9, 50-237/75-12, 50-249/75-14)

- B. Messrs. Harpster, Little and Knop met with Mr. Palmer and other members of the Commonwealth Edison Production and Engineering staff on August 14, 1975, to discuss Commonwealth Edison's schedule for installation and repair of fire stops at the Dresden, Quad-Cities and Zion stations.

Representatives of the licensee stated that:

1. Sargent and Lundy is presently preparing drawings to be used in the repair of deficient penetrations and installation of firestops for penetrations not covered by existing specifications.
2. Advance purchase orders have been issued for ceramic fiber and flamemastic. The vendors expect no problems in meeting the delivery dates.
3. The work package will be issued to the stations by September 2, 1975. Materials are expected to be on site September 8, 1975. Estimated time for completion of the work is three months.
4. The work package will require a 100% audit of penetrations prior to completion of repairs to make certain that all foreign materials are removed. Repair priority will be given to the Control Room, Cable Spreading Room, etc., in accordance with the safety significance of these areas.

NRC representatives asked to be notified of any changes in this schedule and urged that this work be completed as expeditiously as possible.

REPORT DETAILS

1. Personnel Contacted

B. Stephenson, Plant Superintendent
D. Butterfield, Administrative Assistant
J. Jurecki, Staff Assistant to Maintenance Engineer
J. Brunner, General Engineer

2. Visual Examination

The inspector toured the facility with representatives of the licensee to determine the extent of conformance with SAR commitments and Commonwealth Edison standards relating to firestops and seals for electrical penetrations.

This selective audit identified four groups of nonconforming penetrations. These nonconforming penetrations are considered to be a deviation from the following Commonwealth Edison standards:

- a. Cable pan fire stop and air seal through wall (Sargent and Lundy STD-EA-175)
- b. Fire stop in cable riser (Sargent and Lundy STD-EA-176)
- c. Control Board Cable Entrance Seal (Sargent and Lundy STD-EA-179)
- d. Method of sealing ducts for all types of cable (C-5192)

Nonconforming penetrations were identified in the following locations:

- a. Control room
- b. Auxiliary electric room
- c. Cable tunnel
- d. Unit 2 battery room
- e. Computer room
- f. Switchgear room (Busses 21-24)
- g. Turbine building ventilation switchgear room east (Below Unit 3 battery)
- h. Turbine building

3. Combustible Materials

- a. Rags were found by the inspector in two ducts in the cable tunnel and two penetrations in the secondary containment wall. The rags in the secondary containment penetrations had been identified in a May 12, 1975 inspection (IE Inspection Reports 50-10/75-9, 50-237/75-14, 50-249/75-12), and had not been removed.
- b. Wood or masonite boards covered nine horizontal cable tray penetrations in the turbine building. The boards had been identified in the May 12, 1975 inspection, and not not been removed.
- c. The licensee stated that they were inspecting the plant and removing combustible materials from fire hazard areas.