



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
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JUL 12 1974

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

Docket No. 50-249

Gentlemen:

We have reviewed your letter of June 20, 1974, in response to our notice of violation, dated May 29, 1974, concerning apparent violations identified during the Dresden 3 site inspection conducted on April 1, 2, and 23, 1974. As a result of our review, we find that additional information and/or clarification is required for item 2 of our notice of violation in order for us to determine the adequacy of corrective action you have taken, or plan to take, in terms of both the specific violation and the measures to assure similar violations will not occur in the future. A response is required for each of the procedural areas wherein they did not conform to the code requirements, i.e., use of alternate calibration reflectors, transfer mechanism, use of back reflectors in lieu of calibration hole, etc. These are identified in paragraphs 3.a through 3.f of Inspection Report No. 050-249/74-04, which was included as an enclosure to the notice of violation.

It must also be pointed out that paragraph 3 of item 2 in your letter contains several areas which require clarification, as follows: (1) the company's Level III examiner did, indeed, review the General Electric Company data with the AEC during this inspection. However, the letter did not state that the Level III examiner also came to the conclusion that this information was not sufficient to demonstrate equivalency, (2) it is a code requirement that equivalent response be demonstrated (ASME Section III - Appendix IX, Paragraph IX-343, and ASME Section XI, Paragraph 18-214) and is not the AEC Inspector's interpretation of a need, and (3) the results contained in the evaluation report do not support the statement that a comparison of the sensitivity of notched reflectors and drilled holes revealed that they were as sensitive as the code drilled holes. To the contrary, the report "Operational Analysis Department Report on Evaluation of Ultrasonic Calibration Standards of Dresden Station", M-1426-74, dated June 28, 1974, establishes that equivalency cannot be supported. In fact, only two of the

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15 calibration pieces (for Dresden Unit 1) tested showed equivalency. Twelve of the 15 indicated less sensitivity for the 10% holes, but were still sensitive enough so that any indication approaching code rejectable size was recorded (tests showing recordable indications will be repeated, using code drilled holes for calibration) and the remaining test was considered not acceptable under any conditions (this test is required to be completely repeated, using the code hole procedure). While this data was for Unit 1, the data can be related to Unit 3. However, we understand that all data recorded for Unit 3 during this current outage (corrected as a result of the inspection) was based on the use of code required holes.

To reiterate, your response must include, for each violation contained in paragraph 3.a through 3.f of the inspection report: (1) the corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further violation; and (3) the date when full compliance will be achieved.

Sincerely yours,

James G. Keppler
Regional Director

cc: B. Stephenson
Superintendent

bcc w/ltr dtd 6/20/74:

RO Chief, FS&EB

RO:HQ (4)

Licensing (4)

DR Central Files

RO Files

PDR

Local PDR

NSIC

DTIE

Anthony Roisman



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June 20, 1974

Mr. J. G. Keppler, Director
Directorate of Regulatory
Operations - Region III
U.S. Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to Noncompliance Letter of May 29,
1974, Dresden Unit 3, AEC Dkt 50-249

Dear Mr. Keppler:

The following information is provided in response to your letter dated May 29, 1974 concerning an inspection conducted by M. W. Dickerson and F. Maura of Region III on April 5-8 and 12-14, 1974. The responses are listed to correspond with the "Enforcement" items listed in the Summary of Findings of your inspection report.

1. Prior to beginning of the inservice inspection and valve wall thickness measurement program on Unit 3, the nondestructive examination procedures had been finalized and approved by the company's Level III Examiner. The cognizant engineer at the station believed that the Level III Examiner's signature (our company expert) was adequate for implementation of these special procedures.

The Technical Specifications and Q.C.P. 5-51-1 require that all testing procedures shall be reviewed and approved by an operating engineer and the technical staff supervisor with final authorization for use by the station superintendent. To correct the immediate problem, all nondestructive examination procedures utilized for both the inservice inspection and valve wall thickness measurement have been reviewed and approved in accordance with Q.C.P. 5-51.1 as indicated in the Report Details Section, Item 3i of your May 29, 1974 noncompliance letter.

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To reduce the possibility of recurrence, the station training department is initiating a quality assurance training program for all personnel, and the station will review and revise if necessary the "Control of Off-Site Personnel" procedure.

2. Prior to issuance of ASME Section XI, piping inspections on Unit 1 were performed using a 3% and 10% depth notch machined into several piping standards circumferentially and longitudinally. Our company experts believed this approach to be most representative of the type of faults we expected. The results of previous piping inspections employing this long standing ultrasonic method were reviewed several times by the AEC and were acceptable.

When Unit 2 and 3 baseline examinations were to be performed (1970), Commonwealth Edison's Operational Analysis Department requested that General Electric demonstrate the relationship between the sensitivity references of the IIW-2 calibration standard and the 3% notch. This was done and the conclusion was that the 3% notch distance amplitude correction curve compares favorably to the IIW-2 calibration standard.

During the recent AEC inspection, the question of equivalency between the notched reflectors and the code drilled holes was raised, as well as the need to establish such equivalency. The company's Level III Examiner reviewed the General Electric data with the AEC during this inspection. The AEC Inspector judged the data was insufficient to effectively determine equivalency. Because of the AEC inspector's interpretation of a need to establish equivalency, Edison embarked on providing laboratory research to substantiate the equivalency. This effort indicated that not all calibration blocks were equivalent to the code drilled holes. All calibration blocks were then modified by drilling appropriate ASME Section III code required holes and all procedures were revised to conform with the code. These procedures were immediately instituted into the inservice inspection program.

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To ensure that the notched methods used did not overlook any indications that were beyond allowable limits for the examinations performed prior to the procedure changes, an evaluation was made on the only calibration block in this category. The results, which compare sensitivity levels of notched reflectors and drilled holes, revealed that they were as sensitive as the code drilled holes. With this conclusion, Edison feels that adequate evidence exists to support compliance with ASME Section III.

The evaluation report is in the process of being compiled and will be submitted to the Atomic Energy Commission - Region III by June 28, 1974.

3. In the late November, 1973, with the guidance of the Level III Examiner, the station sought to obtain a set of calibration standards conforming with ASME B & PV Code Section III-1971 for the various thicknesses of primary coolant system piping. The new calibration standards were going to be used in conjunction with the inservice inspection procedures that were used in the Unit 2 and 3 baseline examinations to provide consistency. As discussed in Response 2, the baseline examination utilized an IIW calibration block rather than individual piping standards of same nominal diameter and thickness.

To expedite delivery of the materials for preparing the new calibration standards, pipe without certified chemical analyses was obtained. The approximate schedules for delivery of uncertified and certified pipe were 6 and 18 months, respectively; therefore, only uncertified pipe could be obtained in time to allow use of the updated calibration standard during the spring 1974 inspections.

Following the guidelines of the company's Level III Examiner, the standards were used and later a chemical analysis or spectrograph was to be made for proper material certification. As an interim document to substantiate material type, the shipping tickets contained the type material which could be associated with an appropriate "P" number.

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The AEC inspector stated the shipping tickets could not be used as documentation for material type. Consequently, all calibration blocks were sent to the Edison Material Section Laboratory and spectrographed for material identification with appropriate "P" number affirmed. The material type and "P" numbers were obtained and documented as indicated in Item 4c of the Report Details Section of your letter of May 29, 1974. The spectrograph tests are in the station files for future inspection.

In the future, calibration block material orders will require certification of material type which will be referenced in the appropriate nondestructive testing procedure.

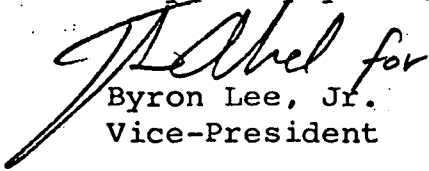
4. During the AEC inspection, it was noted that calibration checks on calibration sheet 55, dated March 29, 1974, apparently exceeded the four-hour time limit as specified in procedure NDT-C-2 Rev 2 by one and one-half hours. Although this data was reviewed by station personnel and independent reviewers, it was inadvertently missed. The certified Level II Inspector who performed the examination was contacted concerning this matter. As a result of this conversation, it was found that he did indeed perform a calibration check prior to and after the lunch hour, which extends from 11:30 to 12:30, but failed to record these values.

This information was documented and signed by the Level II Examiner and attached to the calibration sheet.

This deficiency is considered to be an isolated case due to 155 successful calibration checks performed per the appropriate procedure.

We have reviewed this inspection report for proprietary information and found none. Thank you for the opportunity of reviewing this document.

Very truly yours,


Byron Lee, Jr.
Vice-President