

Common Alth Edison Dresden Nuclear Power Station R.R. #1 Morris, Illinois 60450 Telephone 815/942-2920

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REGULATORY DOCKET FILE COPY.

November 23, 1977

BBS LTR #1095-77

James G. Keppler, Regional Director Directorate of Regulatory Operations - Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137



Reportable Occurrence Report #77-047/03L-0, Docket #050-249 is hereby submitted to your office in accordance with Dresden Nuclear Power Station Technical Specification 6.6.B.2.(c), observed inadequacies in the implementation of administrative controls which threaten to cause reduction of degree of redundancy provided in engineered safety feature systems.

Stephenson

Station Superintendent Dresden Nuclear Power Station

BBS:dlz

Enclosure

.cc: Director of Inspection & Enforcement Director of Management Information & Program Control File/NRC

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CONTROL BLOCK: CONTROL BLOCK:	
0 1 L D R S 3 2 0	
CON'T SOURCE L 6 0 5 0 0 2 4 9 7 1 0 2 6 7 7 8 1 1 2 3 7 7 9 FEPORT DOCKET NUMBER 68 69 EVENT DATE 74 8 1 1 2 3 7 7 9 EVENT DESCRIPTION AND PROBABLE CONSEQUENCES 10 0 2 During normal Unit 3 operation, surveillance program review revealed violation of T.S.1.0.CC.b maximum combined interval time by 3.5 days for HPCI monthly valve and	
0 2 During normal Unit ()3 operation, surveillance program review revealed violation of 0 3 1.5.1.0.CC.b maximum combined interval time by 3.5 days for HPCI monthly valve and	
0 3 T.S.1.0.CC.b maximum combined interval time by 3.5 days for HPCI monthly valve and]
	L
0 4 pump operability. This event had little safety significance since the HPCI pump and	1
0 5 valves operated normally when the late surveillance was performed. Previous surveil-	L
0 6 lance interval discrepancies were reported in LER's 50-237/77-6; 50-249/77-6, 31;	L
0 7 50-237/76-71; 50-249/76-36.	J
] 30
$\begin{bmatrix} 0 & 9 \\ 7 & 8 \end{bmatrix}$ $\begin{bmatrix} 0 & 9 \\ 7 & 8 \end{bmatrix}$ $\begin{bmatrix} 0 & 10 \\ 9 & 10 \end{bmatrix}$ $\begin{bmatrix} CAUSE \\ CODE \\ CODE \\ 11 \end{bmatrix}$ $\begin{bmatrix} CAUSE \\ CODE \\ CODE \\ CODE \\ 12 \\ CODE \\ COMPONENT CODE \\ CODE $,
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$]26 7
111 its late performance. A new computer surveillance tracking system has been institu-	
[1]] ted which provides each department a weekly list of surveillances due based on both	-
[12] single and combined interval requirements. This corrective action should be suffici-	.
7 8 9 FACILITY 30 METHOD OF 8	」 ○
STATUS % POWER OTHER STATUS DISCOVERY DISCOVERY DISCOVERY DESCRIPTION 32) 1 5 E 28 0 9 6 29 NA B 31 Review of Surveillance Records 7 8 9 10 12 13 44 45 46	0
ACTIVITY CONTENT RELEASED OF RELEASE AMOUNT OF ACTIVITY 35 1 6 Z 33 Z 34 NA NA NA]
7 8 9 10 11 44 45 86 PERSONNEL EXPOSURES NUMBER TYPE DESCRIPTION (39) 1 1 7 1 0 1 0 1 (37) 7 1 (38))
7 8 9 11 12 13 PERSONNEL INJURIES 80)
NUMBER DESCRIPTION (41) 1 8 0 0 40 NA	l
7 8 9 11 12 LOSS OF OR DAMAGE TO FACILITY (43) TYPE DESCRIPTION)
] 0
ISSUED DESCRIPTION (45)	7-926
7 8 9 10 68 69 80 NAME OF PREPARER <u>M. Parcell</u> PHONE 265	PO 91

ATTACHMENT TO LICENSEE EVENT REPORT 77-047/03L-0 <u>COMMONWEALTH EDISON COMPANY (CWE)</u> <u>DRESDEN UNIT 3 (ILDRS-3)</u> <u>DOCKET # 050-249</u>

During normal Unit (23() operation, a review of completed surveillances revealed that the intervals between completion of the HPCI monthly valve and pump operability surveillance had exceeded the maximum combined time interval for any three consecutive intervals of 3.25 times the specified single surveillance interval by (TrS.1.0.CC.b)

The surveillance was performed on the following dates:



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> <u>D-3</u> (May 11) (June 14) (July 20) (Aug. 22)

When the HPCI surveillance is performed within the maximum single interval period, it is still possible to exceed the maximum combined interval for any three consecutive intervals. The manual tracking of the HPCI surveillance combined interval was overbooked, resulting in late performance of the surveillance. In order to prevent surveillance interval discrepancies, a new computer surveillance tracking and monitoring system was instituted on 8-1-77. This system utilizes both the single interval and combined interval requirements to determine a due date and a latest date due. A weekly surveillance list is sent to each department listing the surveillances due the next week. As the surveillances are performed, the completion date is entered into the computer for use in future due date determinations. After initiation of the new system, however, three intervals are required for the system to become effective in preventing exceeding the combined interval requirements. This is the reason the surveillance interval was exceeded after implementation of the new computer system. No additional corrective action is planned.

This event had little safety significance since the HPCI pump and valves operated normally when the late surveillance was performed. Previous surveillance interval discrepancies were reported in LER's 50-237/77-6; 50-249/77-6, 31; 50-237/76-71; 50-249/76-36.