

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-237/88030(DRS); 50-249/88031(DRS)

Docket Nos. 50-237; 50-249

Licenses No. DPR-19; DPR-25

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Power Station, Units 2 and 3

Inspection At: Morris, IL 60450

Inspection Conducted: October 22-23, 1987; May 5-6, 11, 12 and
December 21-23, 1988; and January 20, 1989.

Inspector: *Jeff Holmes*
J. Holmes

1/20/89
Date

Approved By: *J. N. Gardner* / *fu*
R. N. Gardner, Chief
Plant System Section

1/20/89
Date

Inspection Summary

Inspection on October 22-23, 1987; May 5-6, 11, 12 and December 21-23, 1988;
and January 20, 1989 (Report Nos. 50-237/88030(DRS); 50-249/88031(DRS))

Areas Inspected: Special safety inspection into allegations of deficiencies
in the fire wrap installations and deficiencies in the training provided to
new installers.

Results: No violations or deviations were identified.

- ° The inspection concluded that while two of the three alleged's concerns were substantiated, no violations of NRC regulatory requirements were identified. With regard to the alleged's third concern, there was no evidence found to support the allegations that there was a lack of independence between Quality Control and Production activities.

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Commonwealth Edison Company

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Distrubtion

cc w/enclosure:

H. Bliss, Nuclear

Licensing Manager

J. Eenigenburg, Plant Manager

DCD/DCB (RIDS)

Licensing Fee Management Branch

Resident Inspector, RIII

Richard Hubbard

J. W. McCaffrey, Chief, Public

Utilities Division

DETAILS

1. Persons Contacted

Commonwealth Edison (CECo)

*E. D. Eenigenburg, Station Manager
E. Armstrong, Regulatory Assurance Supervisor
*B. Barth, Technical Staff Engineer
R. Black, Assistant Fire Marshal
*M. Dillon, Fire Marshal
T. G. Hausheer, Fire Protection Engineer, Production Services
*K. Peterman, Regulatory Assurance Supervisor
C. W. Schroeder, Services Superintendent

Transco

G. Jarose, Engineering Manager
L. Anderson, General Foreman
W. Baar, Installer
B. Fatt, Division Quality Assurance Manager
P. Greaney, Installer
B. Leone, Quality Control
D. Marz, Installer
S. Pearson, Quality Control
D. Sisk, Quality Control

U.S. Nuclear Regulatory Commission (U.S. NRC)

S. DuPont, Senior Resident Inspector

*Denotes these person participating in the telecon exit meeting on January 20, 1989.

2. Allegation RIII-87-A-0074

Region III received a telephone call on May 21, 1987, from a former contractor employee at Dresden who contended that deficiencies existed in fire wrap installations and in the training provided to new fire wrap installers. The individual also indicated that there was a lack of independence between Quality Control and Production Activities. Each of the individual's concerns are addressed below:

Concern 1: The training program provided to new installers consisted of requiring the installer to read the procedure and sign a document that indicated that the installers had read and understood the procedure. The training program did not contain any practical demonstrations and new installers were expected to obtain their training on the job.

NRC Review: The allegation was substantiated in that training provided to new installers consisted of having new installers read the procedure and then sign a document showing that the installers had read and understood the procedure. The allegation was also correct in that the

training did not contain any practical demonstration and the new employees were expected to obtain their training on the job.

The Transco procedure for qualification of site^ocraft personnel (PSQAP 2.1) indicates that the indoctrination period varies in length, and scope, and is totally dependent upon the complexity of the functions involved and past experience of the individual. In addition, the procedure indicates that indoctrination is administered either on-the-job or within a classroom environment and is recorded on the "Site Personnel Certification Form" as attestation to qualification by the Transco Field Superintendent.

In discussions with the licensee and Transco, Transco indicated that the individuals who are hired as installers must have a union card which is obtained by apprenticeship with an experienced installer for at least two years. Transco indicated that if the individual installer can follow directions installing insulation, then the individual can follow Transco procedures. Transco indicated that the procedures are required to be read and this takes approximately 15-30 minutes. Afterwards, the Superintendent reviews the procedures with the installers and discusses key points using the specific details and pertinent documents. The installer is then transferred to a Foreman or Leadman. The Foreman or Leadman is responsible for the crew and usually determines the duties of the new installer (the new installer is normally assigned to a member of the crew).

The inspector conducted field walkdowns and reviewed the training records and the installation procedures. The inspector also discussed the Transco training program with several installers, and Quality Control personnel. The Transco employees indicated a mixed opinion regarding the training from excellent to additional training is required. The general consensus was that the General Foreman and Quality Control personnel would insure that an adequate fire wrap was installed.

Conclusion: Based on a detailed review of the field "take-off" records, installation drawings, nonconformance reports, field walkdowns, and interviews with Transco employees, no discrepancies or violations of regulatory requirements were identified. Although the training provided by Transco to new installers may have been weak in certain cases, it appeared that the Transco General Foreman and Quality Control personnel insured that the installation was done according to design criteria.

Concern 2: On-the-job training was given by new employees and therefore untrained new employees were providing on-the-job training to newly hired employees.

NRC Review: This allegation was substantiated. In discussions with Transco and the licensee, they acknowledged that new employees may have been in a position to provide on-the-job training to new employees, but that the General Foreman and Quality Control personnel observed the key parameters in the installation and would have identified an incorrect installation.

Conclusion: Based on detailed review of the field "take-off" records, installation drawings, non-conformance reports, field walkdown, and interviews with Transco employees, no discrepancies or violations of

regulatory requirements were identified. Although on-the-job training may have been given by new employees, it appeared that the Transco General Foreman and Quality Control personnel insured that the installation was done correctly.

Concern 3: There was a lack of independence between Quality Control and Production Activities in that the Production Superintendent (or General Foreman) was contacting the Quality Assurance Manager and complaining that Quality Control was delaying production. Also, the Production Superintendent controlled the company telephone and truck and prevented Quality Control from using the telephone or truck unless permission was granted from the Production Superintendent or General Foreman.

NRC Review: In discussions with the Quality Assurance Manager, the Manager indicated that telephone calls were received from the field superintendent (or General Foreman) regarding design and installation of the Fire Wrap. The Quality Assurance Manager further indicated that no calls were received regarding Quality Control Inspectors or Quality Control Managers delaying Production. Also, the Quality Assurance Manager indicated that during the exit interviews of the Quality Control Inspectors and Quality Control Managers, no safety issues or issues regarding Production Superintendents contacting the Quality Assurance Manager was discussed.

In addition, the Quality Assurance Manager indicated that Quality Control Inspectors and Quality Control Managers were allowed to use the office telephone for business and not for personal reasons. The Quality Assurance Manager also indicated that the Transco truck was strictly used to transport material and pick-up mail and that permission from the Production Superintendent was required to utilize the company truck.

In discussions with Transco management personnel, Transco indicated that the Quality Control Group was under the direction of the Quality Assurance organization which reported directly to the President of the company and that if any disagreement between production and Quality Control personnel did occur and could not be resolved thru the management organization then it would be resolved by the President of the company.

Conclusion: Based on discussions with the Quality Assurance Manager there was no evidence that the production superintendent (or General Foreman) was contacting the Quality Assurance Manager to report a Quality Control Inspector or Quality Control Manager for delaying production.

In addition, based on discussions with Transco management personnel, the telephone was available for Quality Control, however, the company truck (which was used to transport material) was not available to the Quality Control Group unless permission was granted from the Production Superintendent. The company truck was considered part of the equipment utilized by production and it is not considered unreasonable that the Quality Control Group requested permission to use the company truck.

Based on the above, there was no indication that a lack of independence existed between the Quality Control and Production Activities.

Unit 2 Trackway Fire Wrap Details

The licensee has fire wrapped risers on elevation 517' and 534' consisting of cable tray risers R379 and R380 which interconnect two large sheet metal pull boxes. Transco developed a fire wrap access cover to these pull boxes by using criteria from Transco Detail J6 and Special Drawing EJ 44 (dated January 30, 1987). Due to the numerous physical configurations that may be encountered in the field, 3M allows variances in its application of the material as long as it meets its design criteria. The observed access cover developed by Transco for the licensee appeared to meet the critical criteria such as number of layers, bands, caulking, etc., however, due to its unique design, it was requested that 3M review the installation of this design to ensure that its unique design had not invalidated its fire rating. This is considered an Open Item (237/88030-01(DRS); 249/88031-01(DRS)) pending review of the 3M response.

4. Crib House

During an inspector walkdown, it was observed that a small portion of the fire wrap installation on a junction box did not contain caulk. After the licensee was informed of this concern, the fire wrap was declared partially degraded.

In discussion with the licensee, the licensee indicated that work had been performed on the junction box and the original fire wrap removed. After work was completed, the wrap was replaced and the caulk not replaced in the lefthand corner of the barrier. The licensee indicated to the inspector that 3M will be conducting training sessions for the installation of the fire wrap for workers and Quality Control personnel at the end of January 1989. The licensee also indicated that the small opening will be recaulked by the end of January 1989.

5. Open Items

Open items are matters that have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An open item disclosed during this inspection is discussed in Paragraph 3.

6. Exit Interview

The inspector conducted a telecon meeting with licensee representatives at the conclusion of the inspection and summarized the scope and findings of the inspection. The licensee acknowledged the inspector's comments. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed during the inspection. The licensee did not identify any such documents or processes as proprietary.