**Commonwealth Edison**
1400 Opus Place
Downers Grove, Illinois 60515

November 6, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to NRC Systematic Assessment of Licensee Performance (SALP) Report 237/92001;249/92001
NRC Docket Numbers 50-237 and 50-249

Reference: A. B. Davis letter to C. Reed dated October 8, 1992

Commonwealth Edison (CECo) would like to thank you for meeting with us and presenting the SALP 11 Report on October 20, 1992, as well as affording us the opportunity to provide our perspective on the SALP report, and Dresden Station performance improvement initiatives.

We appreciate the NRC's recognition of superior performance in the areas of Emergency Preparedness and Security and expect to continue this performance in the future.

Dresden Station performance declined late in the SALP 10 inspection period (May 1, 1990 through July 31, 1991) and the decline continued into the early part of this SALP period. Given that the SALP scores issued reflect this retrospective look, we are encouraged by NRC's comments made during the October 20, 1992, meeting that performance did improve during the second half of the assessment period. This was evidenced by the improving trends cited in Radiation Protection and Safety Assessment/Quality Verification. The reference letter made note of the many initiatives undertaken to improve performance. You also recognized that these initiatives are beginning to have a positive effect on performance. We are pleased with your observations expressed during the SALP Meeting, that overall improvement has been noted and is continuing since the SALP period ended on July 31, 1992.

We clearly understand the issues, have taken the necessary actions and are realizing overall fundamental improvement. We believe that to sustain improvement, management must convey their expectations to all levels of the organization and hold personnel accountable. Management will stay involved in the improvement process ensuring that problem resolution is achieved. Our management team understands what needs to be accomplished and we fully expect that our current trend of improved performance will continue.

Attachment A provides CECo's response with regards to our intended corrective actions for the issues identified in the reference letter.

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Attachment B provides clarification of a few minor inconsistencies or discrepancies that we noted while reviewing the SALP 11 Report.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Sincerely,

T.J. Kovach
Nuclear Licensing Manager

TJK/lk

Attachments

cc: A. B. Davis, Regional Administrator, Region III
B. L. Siegel, Project Manager, NRR
W. G. Rogers, Senior Resident Inspector, Dresden

ZNLD/2253/2

## PLANT OPERATIONS

ISSUE:

A lack of management effectiveness in controlling day-to-day operation of the plant, including ineffective communications and procedural issues, was an identified problem in the Plant Operations area.

RESPONSE:

Several Dresden Station 1992 Performance Goals have had a direct positive impact on Plant Operations. Through our comprehensive initiatives to "Improve the Team," both communications and staffing have been enhanced. With respect to communications, shiftly turnovers and logkeeping have improved, with increased detail applied to both. There is a formal Heightened Level of Awareness process in-place to address complex evolutions prior to those evolutions taking place.

The staffing deficit of 5 SROs/ROs has been eliminated with the recent 100% pass rate for the August, 1992 initial license class (8 SROs/ 4 ROs). Dresden is back to a full compliment for both SROs and ROs.

Additionally, several initiatives exist to "Improve the Process." Specifically, improvements to the procedure upgrade process have allowed Operations Procedures to be upgraded with only the verification/review stage left. The Operations procedure upgrade group has added another qualified RO to their staff to assist with this verification and review.

Changes in the work planning methodology have Maintenance and Work Planning working together with added focus on Operations. The shift engineer will have the final decision on daily work schedule activities.

## RADIATION CONTROLS

ISSUE:

Plant worker performance, especially the lack of support for radiation protection practices and policies by line organizations outside the radiation protection department, must be addressed.

RESPONSE:

Dresden Station recognizes the need for improved worker performance and adherance to radiation protection practices and policies. To accomplish this, the station has implemented changes which will improve worker and supervisor accountability. Accountability needs be strengthened outside of the Radiation Protection Department; therefore, Operating and Maintenance have developed specific actions.

Management expectations relevant to radiation protection accountability have been communicated to the operating personnel including:

- Heightened Level of Awareness Meetings (HLAs) are now used for many evolutions to reduce dose and contamination control events.
- Responsibility to contact Radiation Protection upon identification of changes in radiological conditions.
- Acceptable housekeeping conditions have been defined.

To ensure that personnel adhere to proper RP practices and management expectations, Operations management from the first line supervisor to the Assistant Superintendent of Operations, now conduct periodic inplant tours to review work practices and provide immediate feedback as necessary.

In June 1992, Operating issued the Shift Engineer Crew Accountability Plan. This plan requires that each operating crew, under the direction of the shift engineer be responsible for resolving poor radiation practices which may occur during that shift.

The Maintenance Department was recently reorganized to place the general foremen in the field to monitor work practices with focus on radiological practices, housekeeping, material condition and procedural adherence. Poor performance is immediately corrected.

## ENGINEERING/TECHNICAL SUPPORT

ISSUE:

As in the last assessment period, weaknesses were noted in resolution of identified issues as evidenced by a number of long-standing equipment problems. Also, experience levels of technical staff continues to be a concern. Last assessment period we identified the need for close management involvement in light of these problems. It is disconcerting that management oversight of the technical staff remained weak. Failure to effectively address previous concerns contributed to the decline in the rating. In a positive vein, we note increased corporate engineering presence onsite in support of the station and consider your recent vulnerability assessment to be a positive initiative.

RESPONSE:

Dresden Station appreciates your recognition of the increased corporate presence on site. Since June 1989, the corporate engineering staff has steadily increased

The resolution of technical issues is one of the top eleven station Dresden Management Action Plan (DMAP) initiatives. Initiatives included the formation of a Station Vulnerability Assessment Team (VAT).

A Vulnerability Assessment of Dresden Station was conducted by a team of experienced industry personnel during the period of April 20, 1992 to July 10, 1992. During this twelve week effort the qualitative risk assessment of selected systems and their vital components was reviewed. The systems selected for review were those judged to be of most probable significance in reducing core melt frequency. Certain generic issues and on-going engineering programs were also selected for review based on their impact or potential impact on the selected systems. The VAT generated a list of identified vulnerabilities, planned corrective actions, if any, and VAT recommendations. A Station VAT Action Group was formed to develop directions and plans to implement the appropriate response to the VAT findings.

Another station initiative was the formation of a VQ team to examine the current Technical Staff organization. Job descriptions and the responsibilities and expectations of system, component and program engineers, along with their interface with other station departments are the focus of this VQ team.

As an interim measure Dresden Technical Staff was recently reorganized. Assistant Technical Staff Supervisors (ATSS) now have a direct supervisory role. Each ATSS has two or three group leaders they are responsible for and to whom they are expected to provide supervisory guidance. This reorganization will strengthen experienced engineering management oversight of the technical staff. Over the last two years, the experience level in the Tech Staff has continued to rise. Strategic planning of personnel moves has contributed to this improvement.

Dresden Station will be forming a special Dresden Technical Team comprised of the Technical Superintendent, ENC Project Manager, Engineering Supervisor and the General Electric representative. This team will serve as the coordinating group for implementing, assessing, and monitoring the management of Dresden technical efforts. Based on quarterly reviews of current initiatives and programs (including the VAT findings), necessary processes for implementing an aggressive and intrusive engineering/technical program will be established.

## SAFETY ASSESSMENT/QUALITY VERIFICATION

ISSUE:

Problems with the corrective actions program and delays in management resolution of issues were of primary concern.

RESPONSE:

Dresden's station recognized the need to enhance their corrective actions programs and as a result implemented the Integrated Reporting Program (IRP). IRP was implemented on August 19, 1992, using corporate guidance, as well as the lessons learned from Zion and Braidwood's experience with the program. To date, three other processes have been incorporated into IRP. These are Deviation Reports (DVRs), Radiation Occurrence Report (RORs) and Personnel Contamination Events (PCE). Several forms of training were conducted for all levels of site personnel.

Our current plan is to trend Causal Factors using a keyword index, and to trend over time. The more significant event/problems will be trended with the intent of identifying global causes and responses. Lower level items will be trended to identify issues that may require a full root cause investigation. We estimate that there will be sufficient information in the database to perform meaningful trending by the end of 1st Quarter 1993.

To ensure effectiveness of the program implementation, a corporate review of the IRP program was conducted during October 1992. A station effectiveness review program for IRP will be implemented by the end of the 1st Quarter 1993.

Dresden's senior management team developed Dresden's vision and mission, and are sponsors for Dresden's 1992 Performance Goals which focus on improving the team, improving the process and improving the plant. This personal sponsorship of each of the station's high priority initiatives by the senior management team has been effective at focusing this team on the success of the entire station and not just on an individual department basis.

## ATTACHMENT B

During our review of the SALP Report, a few minor inconsistencies were identified. They are as follows:

### RADIOLOGICAL CONTROLS

Page 6, Paragraph 4 - The second sentence cites "...72 days of Unit 3 refueling outage..." were included in the 1991 total station dose. The Unit 3 refueling outage began on September 8, 1991. This means that 114 days of outage occurred during 1991, rather than 72 days.

Page 6, Paragraph 4 - The third sentence indicates there were 118 personnel contamination events during 1991. According to Station records, 180 personnel contamination events occurred in 1991.

### ENGINEERING/TECHNICAL SUPPORT

Page 12, Paragraph 4 - The second sentence cites "...marginal simulator fidelity partly as a result of important temperature and radiation monitoring equipment being either not installed or out of service."

Dresden Station does not believe this statement accurately reflects the current simulator fidelity. The temperature and radiation monitoring equipment referenced as not installed is part of the simulator backpanels. Regulatory Guide 1.149 references ANSI/ANS 3.5 for the standards concerning scope of simulation required. ANSI/ANS 3.5 states that backpanels are not required for simulator certification, but that the information must be provided to the operators. The backpanels are not simulated at Dresden. However, the emergency operating procedure related to temperature and radiation levels for in plant locations is provided on a CRT screen physically located in the backpanel area.

The SPING panel has been inoperable. Work to repair the SPING was delayed earlier in the year while considering a hardware change. The SPING work is scheduled to be completed by the end of 1992.

The SALP Report cited marginal simulator fidelity partly due to the equipment mentioned above. This implies that there are other fidelity issues. A review of the previous four NRC exam reports identified no simulator fidelity issues other than the SPING panel. Dresden is not aware of any other simulator fidelity issues.