



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

November 8, 1992

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3  
Response to Notice of Violation  
Inspection Report 237/92021; 249/92021  
NRC Docket Numbers 50-237 and 50-249

Reference: A. B. Davis letter to Cordell Reed dated  
October 9, 1992, transmitting  
Inspection Report 237/92021; 249/92021

Enclosed is Commonwealth Edison's Company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter. The NOV cited one Severity Level IV violation concerning the failure to establish a test program to demonstrate that Standby Gas Treatment System sensing relays would perform satisfactorily. Our response to this violation is provided in the attachment.

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

DS/cah

Attachment

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

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**ATTACHMENT**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-237/92021; 50-249/92021**

**VIOLATION:**

10 CFR 50, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, prior to August 7, 1992, the licensee failed to establish a test program to demonstrate that four safety related current sensing relays associated with the heaters of the Standby Gas Treatment System, two in each train, would perform satisfactorily in service in that the relays were not included in the station's calibration program.

**REASON FOR VIOLATION:**

During a NRC Electrical Distribution System Inspection followup, NRC inspectors discovered that the Standby Gas Treatment System (SBGT) contained four safety related current sensing relays that were not included in the station calibration program. These relays, two in each train of the SBGT, sense heater current, which in turn determines heater operability. The relays are not used as current protective devices, nor are they used for measuring current flowing through the heater, but instead as SBGT heater ON/OFF sensors.

The relays have not been calibrated since installation. The relays were considered to perform a control function rather than a protective function; therefore, they were not included in the protective relay calibration program. The relays were included in the logic testing program but since they were viewed as ON/OFF sensors, the sensors were considered functional via the logic test and not calibrated. Once identified that a calibration check was necessary, the relays were checked and found to be within calibration.

**CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:**

All four relays were successfully tested for proper operation and were found in calibration on August 7, 1992.

**ATTACHMENT**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-237/92021; 50-249/92021**

(continued)

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:**

Procedure OADMP-1, "D 2/3 SBTG Heater Relay Calibration" was written for the routine calibration of the relays. Additionally, the calibration requirement was added to the Dresden Station General Surveillance (GSRV) Program which is a computer based program used for tracking the required surveillances/calibrations at Dresden Station.

Dresden Station recognized the need to ensure required components are tested or calibrated.

- Dresden Station Technical Staff has reviewed the SBTG System and did not identify any other use of the adjustable type relay.
- The station recently completed the Safety Related Contact Testing Adequacy Program. This program evaluated the majority of the safety related systems and identified the testing requirements of each system using the Technical Specifications and FSAR. Surveillances were then reviewed with the electrical drawings to identify any untested contacts or devices. This program does ensure that relays will perform their design function during a surveillance. If the surveillance failed, then the problem component would be identified, and recalibrated. The SBTG current sensing relays were reviewed and were verified as being tested. For deficiencies that were identified via this program, corrective actions were developed to ensure the contacts or devices are tested.
- The Station is currently verifying that time delayed relays are calibrated. This review will be completed by September 30, 1993.

**DATE OF FULL COMPLIANCE:**

Full compliance was achieved with the calibration of the relays on August 7, 1992.