

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-010/80-10; 50-237/80-09; 50-249/80-13

Docket No. 50-010; 50-237; 50-249 License No. DPR-02; DPR-19; DPR-25

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Power Station, Units 1, 2, and 3

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: May 5-29, 1980

Inspector: *R.L. Spessard*
J. L. Barker *for*

6/19/80

Approved By: *R.L. Spessard*
R. L. Spessard, Chief
Projects Section 1

6/19/80

Inspection Summary

Inspection on May 5-29, 1980 (Report No. 50-010/80-10, 50-237/80-09, 50-249/80-13)

Areas Inspected: Routine, resident inspection of licensee action on previous inspection findings, operational safety verification, licensee event reports, plant trips, inspection during long term shutdown, and outstanding inspection items. The inspection involved 97 inspector-hours onsite by one NRC inspector.

Results: Of the six areas inspected, there were no items of noncompliance identified in five areas. There was one item of noncompliance (deficiency-failure to properly report prompt reportable events in accordance with Technical Specifications - Paragraph 4) identified in one area.

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DETAILS

1. Persons Contacted

- *B. Stephenson, Station Superintendent
- *R. Ragan, Operations Assistant Superintendent
- J. Eeingenburg, Maintenance Assistant Superintendent
- *B. Shelton, Administrative Services and Support Assistant Superintendent
- *D. Farrar, Technical Staff Supervisor
- C. Sargent, Unit 1 Operating Engineer
- J. Wujciga, Unit 2 Operating Engineer
- M. Wright, Unit 3 Operating Engineer
- E. Budzichowski, Unit Support Operating Engineer
- D. Adam, Waste Systems Engineer
- J. Parry, Rad-Chem Supervisor
- B. Sanders, Station Security Administrator
- *E. Wilmere, QA Coordinator

The inspector also talked with and interviewed several other licensee employees, including members of the technical and engineering staffs, reactor and auxiliary operators, shift engineers and foremen, electrical, mechanical and instrument personnel, and contract security personnel.

*Denotes those attending one or more exit interviews conducted on May 9, 23 and 29, 1980.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (10/78-27): Failure to follow procedures dealing with startup of the Unit 1 temporary diesel. The inspector verified that action had been taken to prevent recurrence. Further, the inspector observed removal of the backup diesel from the site.

(Closed) Noncompliance (10/78-31; 237/78-29; 249/78-29; 249/79-03-01; 237/79-23-01): Failure to adequately control access to high radiation areas. The inspector determined that new procedures had been implemented to better control high radiation area doors and that all station personnel had been adequately trained in the importance to properly control personnel in high radiation areas.

(Closed) Noncompliance (237/79-12-01): Exceeding maximum volume of the torus during HPCI testing. The inspector determined that procedures dealing with HPCI operation had been revised to add precautions to pay particular attention to torus level when HPCI was being tested.

(Closed) Noncompliance (237/79-13-09; 249/79-11-09): Inadequate valve, switch, and breaker lineup checkoffs. The inspector verified that the licensee had implemented an ongoing program to ensure that system lineups are and remain in accordance with installed equipment.

(Closed) Noncompliance (249/79-13-02): The reactor was made critical without Unit 2 250VDC battery operable. The inspector verified that the licensee had revised the unit startup procedure to adequately define the terms operable and inoperable.

(Closed) Noncompliance (237/79-20-02): Failure to follow procedures - allowing the nitrogen tank level to drop below sixty inches. The inspector determined that the operators had been adequately cautioned to take action to ensure nitrogen tank level does not drop to sixty inches under normal conditions.

(Closed) Noncompliance (237/79-23-02): Failure to check a high radiation area door locked during a routine plant inspection by an equipment attendant. The inspector determined that the equipment attendants had been adequately cautioned against not following the procedures in their round book to the letter.

(Closed) Noncompliance (10/79-19-01): Failure to follow procedures - no fire watch provided during welding. The inspector verified that all licensee and contractor personnel had been trained in the importance of adequate fire protection during cutting, grinding, and welding.

(Closed) Noncompliance (249/79-24-01): Failure to follow procedures - improper valve manipulations caused the fuel pool to overflow. The inspector verified that training standards for equipment attendant trainees had been upgraded and valves are being better tagged for better identification.

(Closed) Deviation (10/79-06; 237/79-07; 249/79-06): Inadequate procedure to control transient fire loads. The inspector verified that the licensee had revised the implementing procedure to adequately control transient fire loads.

(Closed) Unresolved Item (237/79-15-01): Scram valve and backup scram valves not categorized as safety related. The inspector verified that the scram valves, backup scram valve, and their repair components are categorized as safety related and are maintained under safety related work packages.

3. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of May, 1980. The inspector verified the operability of

selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of Units 2 and 3 reactor buildings and turbine buildings were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the month of May, 1980, the inspector walked down the accessible portions of the Unit 2 and 3 Diesel Generator systems to verify operability. The inspector also witnessed portions of the radioactive waste system controls associated with radwaste shipments and barreling.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under Technical Specifications, 10 CFR, and administrative procedures.

No items of noncompliance were identified.

4. Licensee Event Reports Followup

Through direct observations, discussions with licensee personnel, and review of records, the following event reports were reviewed to determine that reportability requirements were fulfilled, immediate corrective action was accomplished, and corrective action to prevent recurrence had been accomplished in accordance with Technical Specifications.

Unit 1

LER 80-01, Unit 1 fire pump inoperable.

LER 80-02, Discharge to the unit canal in excess of Technical Specification limits.

Regarding LER 80-02, the circumstances associated with this event were reviewed during a previous NRC inspection (Refer to IE Inspection Report No. 50-10/80-08).

Unit 2

LER 79-66, Greater than .7 curies in "A" waste sample tank.

- LER 79-67, Unit 2/3 diesel generator inoperable.
- LER 79-68, Inadequate fire stop in vicinity of bus 28-2.
- LER 80-01, Number 3 turbine control valve inoperable.
- LER 80-02, Surveillance of main steam line low pressure isolation not completed within Technical Specification periodicity.
- LER 80-03, Reactor water level switch tripped in excess of Technical Specification limits.
- LER 80-04, Main steam line isolation valve closed in less than time specified by Technical Specifications.
- LER 80-06, Curie content of "A" waste sample tank greater than Technical Specification limits.
- LER 80-07, Erratic oxygen reading received on oxygen analyzer for drywell atmosphere.
- LER 80-08, Unit 2/3 diesel generator inoperable due to heat exchanger tube leaks.
- LER 80-09, Control rod drive C-11 found uncoupled.
- LER 80-11, Isolation condenser condensate high flow delta-p in excess of Technical Specification limits.

Regarding LER 79-68, the inspector determined that the licensee's management controls identified the inadequate fire stop, corrected the inadequacy, and took corrective action to prevent recurrence. This is considered a licensee identified item.

Regarding LER 80-02, the licensee identified the missed surveillance and took additional corrective action to prevent recurrence. The inspector's review verified that additional management controls in the form of operating orders and procedures have been implemented which should prevent recurrence. This is considered a licensee identified item.

Unit 3

- LER 79-23, Source range monitor tripped in excess of Technical Specification limits.
- LER 79-30, Failure of reactor position indication system on control rod drive H-9.

- LER 79-33, Failure of rod block monitor channel eight.
- LER 79-34, One pound per square inch delta-p lost between torus and drywell while testing AO-3-1601-21.
- LER 79-35, LPCI/CCSW heat exchanger service water outlet feeder breaker found open.
- LER 80-01, Drywell oxygen analyzer inoperable.
- LER 80-03, 3B core spray relief valve found leaking.
- LER 80-05, Two main steam line isolation valve limit switches found greater than 10%.
- LER 80-06, Local leakrate test of "A" feedwater inboard check valve found to be in excess of Technical Specification limits.
- LER 80-07, Local leakrate testing of containment vent line indicated leakage in excess of Technical Specification limits through AO-3-1601-23.
- LER 80-08, Three HPCI area temperature switches tripped in excess of Technical Specifications limits.
- LER 80-09, LPCI injection valve failed to open during a LPCI logic test.
- LER 80-10, Standby liquid control system relief valves RV 1105A & B lifted in excess of Technical Specification limits.
- LER 80-11, Main steam line area temperature switch tripped in excess of Technical Specification limits.
- LER 80-12, Fuel pool ARM's A & B and reactor building ARM A tripped in excess of Technical Specification limits.
- LER 80-13, Local leakrate test of B feedwater check valve in excess of Technical Specification limits.
- LER 80-15, Reactor water cleanup system crack indication and mechanical snubber inoperable.
- LER 80-16, Local leakrate test of HPCI suction valve in excess of Technical Specification limits.
- LER 80-17, Unit 3 diesel generator inoperable.

LER 80-19, Target rock safety/relief valve tripped less than Technical Specification limits.

LER 80-20, 3B Core spray relief valve leaking.

LER 80-21, Failure of ADS valves A, B, C, E to open at system pressure during various startups between April 25, 1980 and April 30, 1980.

Regarding LER 80-15, the circumstances associated with this event were reviewed during a previous NRC inspection (Refer to IE Inspection Report 50-249/80-09).

Regarding Unit 1 LER 80-02 and Unit 3 LER's 80-05 and 80-15, the inspector determined that the NRC was notified by telephone within 24 hours of the prompt reportable event, but the telecopies of the circumstances surrounding the event were not transmitted to the regional office within the next working day because of a clerical error. This is contrary to Technical Specifications, Section 6.6.B. 1 and is considered an item of noncompliance. The licensee's corrective and preventative actions were to send the telecopies to the regional office and to ensure office management verifies that facsimilies are transmitted to the regional office in accordance with Technical Specifications. The inspector has no further concerns regarding this matter and considers it closed.

No additional items of noncompliance were identified.

5. Plant Trips

Following the plant trips of Unit 2 on May 12 and 22, 1980, and Unit 3 on May 14, 1980, the inspector ascertained the status of the reactor and safety systems by observation of control room indicators and discussions with licensee personnel concerning plant parameters, emergency system status and reactor coolant chemistry. The inspector verified the establishment of proper communications and reviewed the corrective actions taken by the licensee.

All systems responded as expected, and the plant was returned to operation on May 17 and 23, 1980 for Unit 2 and May 15, 1980 for Unit 3.

No items of noncompliance were identified.

6. Inspection During Long Term Shutdown (Unit 1)

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of May, 1980. The inspector verified surveillance tests required during the shutdown were accomplished, reviewed tagout

records, and verified applicability of containment integrity. Tours of Unit 1 accessible areas, including exterior areas were made to make independent assessments of equipment conditions, plant conditions, radiological controls, safety, and adherence to regulatory requirements and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector observed plant housekeeping/cleanliness conditions, including potential fire hazards, and verified implementation of radiation protection controls. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan. The inspector reviewed the licensee's jumper/bypass controls to verify there were no conflicts with technical specifications and verified the implementation of radioactive waste system controls. The inspector witnessed portions of the radioactive waste systems controls associated with radwaste shipments and barreling.

No items of noncompliance were identified.

7. Followup of Outstanding Inspection Items

- a. Unit 2 LER 78-09 referenced numerous resin intrusion incidents which occurred on Units 2 and 3 and the corrective action to prevent recurrence. The licensee's program of additional surveillances and modifications to the condensate demineralizer systems appear to have corrected the problem.
- b. The licensee has completed modifications to the LPCI loop selection logic on Unit 3, such that the relay controlling the position of the recirculation pump suction valve is no longer part of the LPCI loop selection process. The inspector verified that the modification was in accordance with licensee procedures and would prevent an active failure of this passive component from automatically shutting the recirculation pump suction valve during a loss of coolant condition.
- c. The inspector reviewed actions required of the licensee by IE Bulletin 79-08 which had not been completed during the NRC inspection documented in Inspector Report No. 50-237/79-13 50-249/79-11. The inspector verified the actions on the items listed below to be adequate and complete.
 - (1) Changes to DGA-5, 6 on loss of HPCI and the isolation condensor.
 - (2) Administrative controls to prevent overriding emergency safety features.

- (3) Ability to open the head vent under a 1000 psi delta-p.
 - (4) Training of operators in the TMI incident.
- d. The inspector verified that the licensee had received the NRR generic letter, "Containment Purging During Normal Plant Operations," and that the licensee had implemented administrative controls to prevent, during containment purging, the improper manual defeat of safety actuation signals.

No items of noncompliance were identified.

8. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on May 29, 1980, and summarized the scope and findings of the inspection activities. The licensee acknowledged the item of noncompliance discussed in paragraph 4.