



Commonwealth Edison
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June 22, 1973

Mr. Boyce H. Grier
Regional Director
Directorate of Regulatory
Operations - Region III
U.S. Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to Noncompliance Letter of May 25, 1973 Concerning Dresden Unit 1, AEC Dkt 50-10

Dear Mr. Grier:

This is in response to your letter of May 25, 1973, which was concerned with six items of noncompliance identified during a recent inspection of Dresden Unit 1. The responses are labeled with the item numbers as indicated in your letter.

A.1 Paragraph B.16.f(1) requires that measurements of the voltage and specific gravity of the pilot cell, the temperature of the adjacent cells and the overall battery voltage shall be made weekly.

Contrary to the above, the voltage of the pilot cell and the temperature of the adjacent cells were not measured during the weeks of January 1-7, 1973, and January 15-21, 1973. Also, the specific gravity and voltage of the pilot cell, the temperature of the adjacent cells, and the overall battery voltage was not measured during the week of February 19-25, 1973.

Response: The control room daily surveillance sheets were initialed indicating that the required surveillance had been completed for each of the three periods in question, however, not all of the data sheets could be located. There were two types of surveillance sheets for this item, i.e. one sheet for the quarterly and monthly checks and a different sheet for the weekly battery readings. The latter did not specify how many

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JUN 23 1973

Mr. Boyce H. Grier

- 2 -

June 22, 1973

weeks of data should be entered on any one form. The multiplicity of forms and the varying number of entries lead to confusion as to what data had been recorded. This ambiguity has been corrected by a procedure change which places all the required battery data on one sheet and specifies the number of weeks the sheet can be used.

The purpose of the battery check is to provide adequate indication that the batteries have the specified ampere hour capability and to locate a weak cell before it becomes unserviceable. Experience indicates that loss of capability is a long, slow process. Measurements made since the time in question indicate that the battery is still completely operable.

In addition to the corrective measures described above, and the measures now in existence, tighter control of surveillance records will be accomplished in the following ways:

1. The personnel involved with handling the surveillance sheets will be cautioned on the need to maintain tight control over the surveillance records.
2. A sign out procedure will be instituted for the surveillance file.
3. The station personnel will make semi-annual audits of the surveillance documentation.

A.2 Paragraph B.16.3(1) requires that the diesel generator be manually started and loaded once each month to demonstrate operational readiness. The test is to last long enough for the diesel engine and the generator to reach equilibrium temperature at full load. Contrary to the above, documentation to show that the generator was started and loaded to full load output and maintained in that condition until the engine and generator reached equilibrium temperature during the month of December 1972 could not be located by the licensee.

Response: The diesel generator was started and loaded for one hour on December 9, 1972. The Shift Engineer and Control Room Logs document the operation of the diesel.

POOR ORIGINAL

Mr. Boyce H. Græer

- 3 -

June 22, 1973

The actual completed surveillance test data sheet was received by the surveillance engineering assistant but was subsequently misplaced. The remaining documentation appears to be adequate to verify compliance with the surveillance requirement, however, the additional measures outlined in the response to item A.1 will be implemented to reduce the chance of misplacing the data sheets.

- B.1 Paragraph J.3.a requires that all abnormal occurrences shall be promptly reported to the Manager of Production or his delegated alternate and shall be promptly reviewed by the Station Review Board. Contrary to the above, the abnormal occurrence concerning the bypassing of in-core monitoring string 113 was not reported to the Manager of Production or the Superintendent of Production, Division A, until approximately 63 hours after the event had taken place and was not reviewed by the Station Review Board until approximately nine days after the event had taken place.

Response: According to the Technical Specifications, the definition of "immediately" is "that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action". "Prompt" should be less and certainly not more restrictive than "immediate". In view of the nature of the occurrence and the fact that the necessary corrective action (repair and replacement of the defective monitors) had been taken, and the matter discussed informally within station management, the 63 hour notification should be considered prompt. A procedure is being developed for reporting to the general office management and a telecopier is now available on working days for transmitting written deviation reports.

It appears that the Station Review Board's review of this incident was entirely proper. On April 9, 1973, the same day that station management was notified of the occurrence, the Station Review Board chairman appointed a committee to review and initiate a report of the event. The committee prepared a report and submitted it for Station Review Board review on April 17, 1973.

- B.2 Paragraph J.5.a and J.5.b require that abnormal

Commonwealth Edison Company

Mr. Boyce H. Grier

- 4 -

June 22, 1973

Contrary to the above, operation during the week of March 5-11, 1973 with the emergency condenser shell-side water temperature in excess of its limit of 100°F was not reported to the AEC.

Response: An occurrence similar to this was also noted by your inspector during his inspection of November 28 through December 1, 1972. The circumstances surrounding that occurrence were explained in our February 7, 1973 response to your January 18, 1973 letter.

At that time it was indicated that a change in the 100°F limit could be justified and would be requested. Until that time, shell-side water temperature would be reported in accordance with Paragraph J.5 of the Technical Specifications. A request to change the limit from 100°F to 212°F was made on February 7, 1973 and was authorized by the Commission on March 12, 1973.

In the period preceding authorization of the 212°F limit, the temperature exceeded 100°F three times. On February 23, 1973, W. P. Worden notified A. Giambusso that the temperature was observed to be 115°F on February 5, 1973, as a result of emergency condensate return line valves being cycled on February 4.

The report of the third occurrence, dated March 21, 1973, was prepared but was not sent within the required 30 days. The letter to Mr. Giambusso indicated that high ambient air temperatures in the immediate vicinity of the emergency condenser had caused the shell-side water temperature to exceed 100°F during the March 5-11, 1973 period noted in your May 25 letter. It was indicated that the temperature limit would continue to be exceeded until the ambient air temperature dropped. We believe that this satisfied the Technical Specification reporting requirement, and that therefore, it was not necessary to submit a separate report for each of the days in the period of March 5-11. The report addressing that occurrence was prepared and reviewed by the Station Review Board on March 20. The report

Mr. Boyce H. Grier

- 5 -

June 22, 1973

was distributed internally but the letter of notification to the AEC was inadvertently not sent. The letter was viewed by your inspectors during the April 17-25, 1973 inspection and it was subsequently discovered that the letter had not been sent. The report was sent to the Commission on April 27 which was immediately following notification that it had not been received.

- C.1 Paragraph J.2.a(9) requires that detailed written procedures, including applicable checkoff tests and instructions shall be prepared and approved to assure the safe shutdown of the plant in the event of a flood designated as a Probable Maximum Flood. Contrary to the above, the licensee has failed to prepare and approve such a procedure although this requirement has been in effect for over 10 months.

Response: The procedure for the Probable Maximum Flood (PMF) was not prepared because of a pending request for a waiver of the requirement which was submitted to the Commission on February 7, 1973. It was denied on March 12, 1973. At present, hydro-meteorological data and basin topographical characteristics have been used to estimate the crest of the PMF at the Dresden site. Engineering analysis is underway to determine the impact of such a flood on the station and devise a plan of action. The required procedure will be prepared and approved in approximately two months.

- C.2 Paragraph B.9.a requires that an in-core monitoring system be provided capable of automatic scram at not more than 125 percent of rated local power whenever the reactor is operating at power levels greater than 350 MWt. The scram is to be actuated by coincidence of signals from two or more monitors, provided that the arrangement does not have the effect of leaving unmonitored a core region exceeding any vertical cylindrical core volume four feet in diameter within the central 8.5-foot diameter vertical cylindrical core volume.

POOR ORIGINAL

Mr. Boyce H. Grier

- 6 -

June 22, 1973

With respect to the above, we have examined your corrective actions relative to procedure modifications and have no further questions at this time. However, your response to this item should include your actions with respect to how this and similar events are being incorporated into your retraining program so that the number of operator errors are minimized.

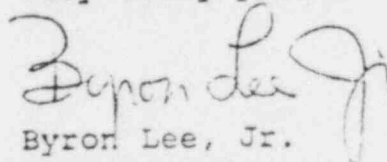
Response: Station management has reviewed this incident with the shift supervisors involved. In addition, possible ambiguous procedures have been clarified.

To minimize operator errors, these types of problems are reviewed with shift operators through the following four programs:

1. Any operating errors are reviewed with the personnel involved to insure understanding of the situation.
2. All deviation reports are routed to all holders of reactor operator's licenses for their review.
3. Plant modifications, operating orders, and procedure changes (normally manually placed on video tape) are provided for shift personnel review.
4. The present retraining program includes three days per year at a simulator training program and a total of at least 40 hours in the classroom on a periodic basis.

I believe that the corrective measures outlined above constitute positive action to prevent further occurrences of the types noted in your inspection. Please contact my office if further information is required.

Very truly yours,


Byron Lee, Jr.
Vice-President