

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

REGION III

Reports No. 50-010/80-14; 50-237/80-17; 50-249/80-21

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, & 3

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: August 3 to September 6, 1980

Inspectors: J. L. Barker

T. M. Tongue

F. W. Reimann

M. J. Jordan

Approved by: R. L. Spessard, Chief
Projects Section 1

R. L. Spessard 9/29/80
T. M. Tongue 9/29/80
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Inspection Summary

Inspection on August 3 to September 6, 1980 (Report No. 50-010/80-14;
50-237/80-17; 50-249/80-21)

Areas Inspected: Routine, unannounced resident inspection of operational safety verification, Units 2 and 3; monthly surveillance observation; monthly maintenance observation; inspection during long-term shut down, Unit 1; IE Bulletin followup; IE Circular followup; and followup on a plant incident. The inspection involved a total of 283 inspector hours onsite by four NRC inspectors including 49.5 hours onsite during off-shifts.

Results: Of the seven areas inspected, there were no items of noncompliance identified in six areas. There was one item of noncompliance (Infraction - licensee personnel failed to follow radiation protection procedures - Paragraph 2) identified in one area.

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DETAILS

1. Persons Contacted

- *D. Scott, Station Superintendent
- *B. Stephenson, Station Superintendent (past)
- *R. Ragan, Operations Assistant Superintendent
- *J. Eeingenburg, Maintenance Assistant Superintendent
- *D. Farrai, Administrative Services and Support Assistant Superintendent
- *J. Brunner, 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
 - G. Myrick, Rad-Chem Supervisor
 - B. Sanders, Station Security Administrator
 - B. Zank, Training Supervisor
 - M. Stanish, Q.A. 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 August 15, 22, 29, and September 5, 1980.

2. Operational Safety Verification

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

During an off-shift inspection on the morning of August 8, 1980, while making a tour of the control room at about 0610 hours, the inspector observed what appeared to him to be the center desk and Unit 3 operators sleeping while on watch. He immediately went to the shift engineer's office to have the shift engineer verify the men were sleeping. To the inspector's surprise, the shift engineer called the center desk operator and asked that the sleeping operators be waked. The inspector informed the station superintendent, then Mr. B. B. Stephenson of the incident on the morning of August 11, 1980. The station superintendent informed the inspector that an investigation surrounding the circumstances of the incident would be conducted.

Following the investigation, the inspector was informed that the operators in question had denied being asleep, and that the station management would take the following corrective actions (1) place a copy of the investigation report in the operator's personnel file, (2) write a memo to all operators reiterating the station's policy concerning sleeping onsite, and (3) on an interim basis the Unit 1 operator will be relieved of duties to relieve the Unit 2 and 3 operators during each shift for a rest period.

During discussions with the NRC Region III management, it was determined that a complete investigation by a Region III investigation specialist would be conducted during the week of September 8, 1980, and any enforcement action would be delineated in that investigation report.

During a routine verification of outages 80-588 and 80-589 on the overhaul of 2A CRD pump, the inspectors observed licensee personnel working on the open pump without the work area having required postings and without wearing appropriate protective clothing (shoe covers and gloves only). The inspectors were unable to determine who set up the control area and who determined what protective clothing was needed. In addition, it was found that no survey had been conducted by Radiation Protection to determine what safety precautions should be taken. It was also found that Radiation Protection had not been contacted to perform the survey when the pump casing was broken open. Subsequent surveys at the request of the resident inspectors revealed contamination and radiation levels of sufficient magnitudes to warrant use of full protective clothing. The inspectors also found that this type of situation was further aggravated in that at Dresden there are no specific instructions on the outage forms or work requests requiring workers to obtain Radiation Protection concurrence (if necessary) before performing the task.

No other items of noncompliance were identified.

The above observations are in noncompliance with Technical Specifications 6.2 B which states, "Radiation control procedures shall be maintained, made available to all station personnel, and adhered to."

These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20." The Dresden Radiation Protection Manual, Chapter 37, Radiation Control Standards 37-1-A-1, Rev. 0, March, 1974 which states in part ". . . when radiation work involves raising radioactive materials in the pools above established radiation levels, uncovering contaminated materials, valving or opening process lines, or disassembling radioactive equipment, Radiation Protection shall be informed before the fact so that a proper evaluation of the radiological consequences may be made." (10/80-14-01; 237/80-17-01; 249/80-21-01)

3. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with technical specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

Unit 2 CRD pump
Unit 2 A-LPCI pump
Unit 2 B-LPCI Heat Exchanger

Except as previously identified in paragraph 2, no items of noncompliance were identified.

4. Monthly Surveillance Observation

The inspector observed technical specification required surveillance testing on the SRM's, IRM's, and LPRM's and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished,

that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

No items of noncompliance were identified.

5. IE Bulletin Followup

For the IE Bulletins listed below the inspector verified that the written response was within the time period stated in the bulletin, that the written response included the information required to be reported, that the written response included adequate corrective action commitments based on information presented in the bulletin and the licensee's response, that licensee management forwarded copies of the written response to the appropriate onsite management representatives, that information discussed in the licensee's written response was accurate, and that corrective action taken by the licensee was as described in the written response.

- IEB 79-12 Short Period Scrams at BWR Facilities.
- IEB 79-13 Cracking Feedwater System Piping.
- IEB 79-17 Pipe Cracks in Stagnant Borated Water Systems at PWR's.
- IEB 79-18 Audibility Problems Encountered on Evacuations of Personnel from High Noise Areas.
- IEB 79-21 Temperature Effects on Level Measurements.
- IEB 79-23 Potential Failure of Emergency Diesel Generator Field Exciter Transformer.
- IEB 79-28 Possible Malfunction of Namco Model EA-180 Limit Switches at Elevated Temperatures.
- IEB 80-01 Operability of ADS Valve Pneumatic Supply.
- IEB 80-03 Loss of Charcoal from Standard Type II, 2 Inch, Tray Adsorber Cells.
- IEB 80-04 Analysis of a PWR Main Steam Line Break With Continued Feedwater Addition.
- IEB 80-05 Vacuum Condition Resulting in Damage to Chemical Volume Control System Holdup Tanks.
- IEB 80-06 Engineered Safety Feature (ESF) Reset Controls.
- IEB 80-07 BWR Jet Pump Assembly Failure.
- IEB 80-09 Hydromotor Actuator Deficiencies.

Regarding IEB 80-01, the licensee has committed to upgrading air piping on the ADS valves from the check valve to the valve operator to meet seismic design criteria. This will be reviewed during a future inspection (237/80-17-02; 249/80-21-02).

Regarding IEB 80-06, the licensee has committed to modifications of the control switches for isolation condenser valves 1301-1, 2, and 4 to prevent reopening following an isolation signal reset and to performing integrated surveillance on modified systems during the next refueling outage (Unit 2 - 1981, Unit 3 - 1981/2). This will be reviewed during a future inspection (237/80-17-03, 249/80-21-03).

Regarding IEB 80-17, the licensee has committed to perform the required inspections on Unit 2 during the next refueling outage. This will be reviewed during a future inspection (237/80-17-04).

No items of noncompliance were identified.

6. IE Circular Followup

For the IE Circulars listed below, the inspector verified that the Circular was received by the licensee management, that a review for applicability was performed, and that if the circular were applicable to the facility, appropriate corrective actions were taken or were scheduled to be taken.

IEC 78-15	Tilting Disk Check Valves Fail to Close with Gravity in Vertical Position.
IEC 78-16	Limiter Valve Actuators.
IEC 78-18	UL Fire Test.
IEC 79-07	Unexpected Speed Increase of Reactor Recirculation MG Set resulting in Reactor Power Increase.
IEC 79-12	Potential Diesel Generator Turbocharger Problem.
IEC 79-17	Contact Problem on SB-12 Switches on G.E. Metalclad Circuit Breakers.
IEC 79-18	Proper Installation of Target Rock Safety/Relief Valves.
IEC 79-19	Loose Locking Devices on Ingersoll-Rand Pumps.
IEC 79-20	Failure of GTE Sylvania Relay Type PM Bulletin 7306, Catalog 5U12-11AC with a 12V Coil.
IEC 79-22	Stroke Times for Power Operated Relief Valves.
IEC 79-23	Motor Starters & Contactors Failed to Start.
IEC 79-24	Proper Installation and Calibration of Core Spray Pipe Break Detector Equipment on BWR's.
IEC 80-01	Service Advice for G.E. Induction Disc Relays.
IEC 80-03	Protection from Toxic Gas Hazards.
IEC 80-04	Securing of Threaded Locking Devices on Safety Related Equipment.
IEC 80-05	Emergency Diesel Generator Lubricating Oil Addition and Onsite Supply.
IEC 80-15	Loss of Reactor Coolant Pump Cooling and Natural Circulation Cooldown.

No items of noncompliance were identified.

7. Inspection During Long Term Shutdown

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

8. Followup on Plant Incidents

During this report period, a problem with accountability of nuclear system water onsite was brought to the attention of the inspectors. Based on licensee statements, the problem appears to be a reduction in the amount of water available due to apparent leakage, monitoring techniques, record keeping or combination thereof. This matter is being pursued by the resident inspectors as well as inspectors from the regional office and it will be the subject of a separate inspection report.

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on September 5, 1980 and summarized the scope and findings of the inspection activities. The licensee acknowledged the item of noncompliance in paragraph 2 and the other findings identified in this report.