

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

REGION III

Report No. 50-010/77-23; 50-237/77-21; 50-249/77-21

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

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

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

Inspection at: Dresden Site, Morris, IL

Inspection conducted: August 11, 12, 15, 16, and 23-26, 1977

Inspectors: *W D Shafer*
W. D. Shafer 9-1-77

R C Knop
R. C. Knop 9-1-77

Approved by: *R C Knop for*
Gaston Fiorelli, Chief 9-1-77
Reactor Operations and
Nuclear Support Branch

Inspection Summary

Inspection on August 11, 12, 15, 16, and 23-26, 1977 (Report No. 50-010/77-23; 50-237/77-21; 50-249/77-21)

Areas Inspected: Routine, unannounced inspection of plant maintenance on Units 1, 2, and 3; licensee event reports for Unit 2 and 3; quality control department review functions; and a tour of plant areas. In addition, an announced security meeting was attended by the inspector on August 23-26, 1977. The inspection involved 72 inspector-hours onsite by two NRC inspectors.

Results: Of the four areas inspected, no items of noncompliance or deviations were found in three areas; two apparent items of noncompliance were found in one area (Infraction - failure to follow procedures; Infraction - failure to test equipment upon completion of maintenance - Paragraph 3).

DETAILS

1. Persons Contacted

- *B. Stephenson, Station Superintendent
- *B. Shelton, Administrative Assistant
- *C. Sargent, Technical Staff Supervisor
- *J. Eenigenburg, Dresden Maintenance Engineer
- *G. Abrell, QA - General Office
- *R. Kyrouac, Quality Control Engineer
- *J. Reardanz, Quality Assurance
- *R. Rowland, Quality Assurance
- *J. Bell, Dresden Maintenance
- *D. Schildgen, Quality Assurance
- *J. Plese, Storekeeper

The inspector also talked and interviewed with other licensee employees, including members of the technical and engineering staff, and reactor operator personnel.

*denotes those attending the exit interview.

2. Licensees Quality Control Review

While reviewing the Quality Control Department's results of routine investigations, the inspector noted that the licensee had identified and corrected two items with respect to Technical Specifications. The inspector noted that many of the problems identified by the Quality Control Department are primarily related to the storeroom and the handling of safety related equipment. Resolution of these storeroom problems is being accomplished, however, the inspector noted that the length of time taken for final resolution is exceedingly long. The problem of prompt response by the storeroom to Quality Control concerns will be followed further during normal routine inspections.

Upon completion of reviewing the Quality Control Department's deficiency reports relating to the storeroom, the inspector toured the warehouse storeroom and found that several safety related components (a target rock safety relief valve and a control rod blade), were receiving inadequate storage with respect to proper wrapping, desiccant and covers. In discussing

this concern at the exit interview, the inspector noted that the inadequate storage of this safety related components would normally be an item of noncompliance, however, a previous inspector report (50-237/77-18; 50-249/77-18); the licensee received an item of noncompliance with respect to receipt storage and handling of safety related items. The licensee's response to this noncompliance is not due until late August, 1977, therefore these findings were forwarded to management as additional examples of the previously identified noncompliance.

3. Review of Plant Maintenance (Units 1, 2, and 3)

The inspector reviewed 50-safety related work requests and approximately 200 non-safety related work requests to verify that, safety related work was being properly identified, approved procedures were being used where applicable, maintenance activities were being properly inspected, functional testing and calibration prior to returning components or systems to an operating status was being accomplished, quality control records were adequate, personnel assigned maintenance work were properly qualified, and that all safety related maintenance work requiring reporting to the NRC was reported as identified in the Technical Specifications. The following concerns were identified:

Work request 5500, Solenoid Valve Replacement for CRD H-9, required the issuance of a safety related solenoid valve from the storeroom. The solenoid valve that was issued from the storeroom was later identified as non-safety related by the Quality Control Department. The resolution of this problem appeared to be the "Grandfathering In" of this suspect solenoid valve in order to justify its use in a safety related system. However, the inspector determined that the licensee failed to follow their quality control procedures (QP 15-52) with respect to nonconforming materials. The "grandfathering in" of equipment used in safety related systems is an acceptable practice, however, a proper engineering review must be conducted to make this determination. Quality procedure 15.52 would have provided this review. This example of noncompliance was discussed at the exit interview.

While reviewing several work requests relating to testing of safety valves, the inspector noted that the instruments used to set these safety valves are not always properly calibrated. In discussions with licensee representatives, the inspector determined that the calibration of these instruments is generally accomplished prior to testing of any safety valves. However,

while reviewing a work request accomplished in February, 1977, and relating to safety valve testing, the inspector noted that instruments used for setting the safety valve setpoints were calibrated in September, 1976, and in January of 1975.

Much confusion appeared to exist between departments as to which department was responsible to assure proper calibration. In reviewing the licensee's procedures, the inspector determined that QP 12-52, Control of Measuring and Test Equipment for Operations - Station Instrumentation, requires the instrument engineer to control the calibration of this instrumentation. Failure to follow this procedure was discussed at the exit interview.

In reviewing several non-safety related work requests, the inspector found that the licensee treats the repacking and/or tightening of packing on containment isolation system valves as non-safety related. The inspector informed the licensee that any work performed on a safety related component must be followed by a test of that component if the work performed in any way affects that component's operability. In this case, containment isolation system valves require timing and testing prior to returning to operation. This item of noncompliance was discussed at the exit interview.

In general, it appears that the maintenance department is doing a good job on most safety related work requests. The above described concerns appear primarily as a result of inadequate management control. No further concerns were identified.

4. Review of Licensee Event Reports (Units 2 & 3)

Through direct observation, discussions with licensee personnel, and a review of the records, the following licensee event reports were reviewed to determine that reporting requirements were fulfilled, immediate corrective action was accomplished, and corrective action to prevent reoccurrence has been accomplished by the Technical Specifications.

Unit 2

Report No. 77-21, LPCI Valve 2-1501-3A failed to open.
Report No. 77-20, LPCI Heat Exchanger Leak.

Unit 3

Report No. 77-25, 26, 27, Failure of Relief Valve Pilot Stems after Maintenance.

Report No. 77-28, Low level in diesel generator day tank.

Report No. 77-29, Failure of Unit 3 diesel generator cooling water pump.

5. Plant Tour

The inspectors walked through various areas of the plant to observe operations and activities in progress, to inspect the general state of cleanliness, housekeeping and adherence to fire protection rules.

The inspectors noted that housekeeping in general, appeared adequate, however, the Unit 2 reactor building was in significant need of housekeeping attention. The inspectors also noted that material to be used in the forthcoming refueling outage was scattered throughout the building with no apparent attempt for control. This was discussed at the exit interview.

During the plant tour the inspectors noted that a hole had been cut through the concrete wall from the outside of the turbine building. The location of rebar in the opening appeared to prevent unauthorized access by persons outside the turbine building, however, the licensee was cautioned to secure the penetration in order to prevent unauthorized access.

No items of noncompliance or deviations were identified.

6. Security Meeting

On August 23-26, 1977, the inspector attended a safeguards meeting at the Dresden site. Information discussed at this meeting is exempt from public disclosure as provided by 10 CFR 2.790(d).

7. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on August 16, 1977. The inspector summarized the scope and findings of the inspection. The licensee representatives made the following remark in response to certain items discussed by the inspector.

Acknowledge the statement by the inspector with respect to the items of noncompliance (Paragraph 3).