Reg. Files

UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
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TELEPHONE
(312) 858-2660

October 19, 1972

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Assistant to the President
P. O. Box 767
Chicago, Illinois 60690

Docket No. 50-10

Gentlemen:

This refers to the inspection conducted by Messrs. Maura, Fisher, and Fishbaugher of this office on August 29, 30, 31, and September 1, 1972, of activities at Dresden Unit 1 authorized by AEC Operating License No. DPR-2, and to the discussion of our findings held by Mr. Maura with Mr. Worden of your staff on September 1, 1972.

Areas examined during this inspection included the status of the service water monitor sensitivity determination and of tests to confirm the effects of the D-1 chimney particulate sampling piping configuration; the status of the revisions to the Plant Operating Procedures manual, the core spray system installation, and the safety valves reaction forces analysis; the operator retraining program; the leak tightness of the off-gas isolation valves; availability and surveillance testing results of the standby liquid control system; handling of reactor vessel studs during refueling; the performance of the primary system leak detection system; and future refueling plans. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspectors.

In addition to the above matters, the inspectors examined the results of the following efforts:

1. Your review of the diesel generator system conducted for the purpose of identifying and annunciating any abnormal conditions which could prevent diesel operation as noted in our May 15, 1972 letter.

2. Your correlation of the off-gas monitor response to activity in the off-gas line and the installation of a mechanical stop on the monitor range change switches to ensure that the limit as stated in the Technical Specifications is not exceeded, as noted in our June 7, 1972 letter.

3. Your present method for accounting for radionuclides in the off-gas stream plus those being discharged from the gland seal system as noted in our June 7, 1972 letter.

We have no further questions on these items at this time.

Our May 15, 1972 letter noted that certain items had been referred to our AEC Headquarters staff for evaluation and possible enforcement action. It has been concluded that certain of the activities identified during our February 1972 inspection to which our May 15 letter refers appeared to be in nonconformance with AEC requirements. The items and references to the pertinent requirements are listed in the enclosure to this letter. Please provide us, in writing, within twenty days, with your comments concerning the above items, any steps which have been or will be taken to correct them, any steps that have been or will be taken to prevent recurrence, and the date all corrective action or preventive measures were or will be completed. Also in your reply, you should describe those actions taken or planned to improve the effectiveness of your quality assurance program.

We understand Licensing had verbally concurred in you starting the installation of portions of the ECCS prior to the final authorization of Change No. 17 to your facility license DPR-2. We have no further questions on this matter at this time.

It is our understanding, based on discussions with your site representative, that the following actions will be pursued:

1. Demonstrate the off-gas isolation valve isolation integrity prior to the next refueling outage.

2. Establish methods to conduct testing which will demonstrate the operability requirements of the standby liquid control system discharge line as specified in the newly proposed Technical Specifications to the facility license.

3. Inform us the next time condensate demineralizer regenerants are being processed so that we can obtain a sample of the regenerant solution in the Waste Neutralizer and 'B' SSG Blowdown tanks.

We will examine these matters further during a future inspection.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Boyce H. Grier
Regional Director

Enclosure:
Description of Nonconformance Items

cc: W. Worden, Dresden Plant Superintendent

bcc: RO:HQ (4)
Licensing (4)
DR Central Files
PDR
Local PDR
NSIC
DTIE
RO Chief, RT&OB

ENCLOSURE
DOCKET NO. 50-10

Certain activities under your license appear to be in nonconformance with AEC regulatory requirements as listed below:

"Supplement A to Proposed Change No. 17 to Operating License DPR-2 as Amended, DKT 50-10," dated September 17, 1970, submitted to the Division of Reactor Licensing, states in part that:

(a) The quality assurance for the core spray cooling piping for Class I piping will be as defined in ANSI 31.7 for Class I piping systems.

(b) Quality Assurance for valves and pumps will be in accordance with the ASME draft code for pumps and valves for nuclear power reactors.

(c) "The guide for the Quality Assurance Program for the Construction of Nuclear Generating Units" filed with the AEC Docket Nos. 50-295 and 50-304 will be used for the installation of the core cooling system.

Contrary to the above:

1. Measures were not established to prevent the electrical and control cables of spare core spray pump CS-1C from being run in the cable trays of both core spray pumps 5A-2 and 6A-2, thus, resulting in an installation which was not in accordance with paragraph 4.2 of IEEE Standard Criteria 279 for Protection Systems for Nuclear Power Generating Stations.

2. The pipe hangers for the core spray system appeared to be installed without approved sketches. Work procedures had not been established or implemented in that the spring tensioned hangers had been installed without spring tension requirements, causing two of the three hangers to "bottom-out" when the system reached operating temperature and pressure.

3. There was no evidence that the valve casting wall thickness of the valves within the containment (check valves of core spray system) had been inspected against minimum wall casting requirements prescribed by the "Draft ASME Code for Piping and Valves for Nuclear Power."

4. There was no evidence that the liquid penetrant examinations of the core spray piping was performed using a qualified procedure and by a qualified technician in accordance with paragraphs B-110.1, B-110.5 of Appendix B of USAS B31.7.

5. There was no evidence that the Phillips-Getschow welders borrowed by F. Coury to weld in the core spray system were requalified to F. Conry's procedures in accordance with paragraph 1-727.5.3 of USAS B31.7.

6. There was no evidence that visual inspections of each weld preparation were made for the core spray piping welds in accordance with paragraph 1-736.5.1 for Class I piping of USAS B31.7.

7. There was no evidence that the preheat and interpass temperatures of stainless steel pipe welds were checked by the methods described in USAS B31.7, paragraph 1-731.2.2.

8. There was no evidence that a program was established for the issuance, storage and control of welding electrodes.

9. There was not available a weld repair procedure for guidance in the repair of welds in accordance with paragraph I-727.7 of USAS 31.7.