



Commonwealth Edison

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June 18, 1982

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 1, 2 and 3
Response to IE Inspection Report
Nos. 50-10/82-04, 50-237/82-06
and 50-249/82-06
NRC Docket Nos. 50-10/237/249

- Reference (a): R. L. Spessard Letter to Cordell
Reed dated May 21, 1982.
- (b): E. D. Swartz letter to D. G. Eisenhower
dated April 15, 1982.
- (c): E. D. Swartz letter to D. G. Eisenhower
dated June 11, 1982.

Dear Mr. Keppler:

Reference (a) provided the results of an inspection conducted by Messrs. T. M. Tongue and M. J. Jordan of your office during the period of January 30 through April 2, 1982, of activities at our Dresden Station. During that inspection, certain activities appeared to be in noncompliance with NRC requirements. The Attachment to this letter provides the Commonwealth Edison Company response to this Notice of Violation.

Additionally, Reference (a) emphasized Region III's concern with our alleged failure to recognize that we were not in full compliance with the requirements of TMI Task Action Item II.B.4 "Training For Mitigating Core Damage". As a result, we were requested to address this matter and provide an assessment of the adequacy of our review of TMI Task Action Item requirements and commitments.

The Commonwealth Edison Company has noted the concern expressed by Region III that this specific TMI Task Action Item noncompliance may indicate a broader problem associated with the review of TMI Task Action Item requirements and tracking of commitments relative to these items. We believe, however, this noncompliance item is an isolated circumstance that is not representative of our normal practices.

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The Commonwealth Edison Company review of NUREG 0737 requirements and our associated commitments for all of our operating reactors is a very dynamic process. This is in-part due to the continually evolving requirements imposed upon our Company due to ongoing NRC Staff evaluations of our submittals and Staff Generic Letter activity. Additionally, as unforeseen implementation problems arise, re-review of our commitments and positions becomes necessary.

As an overview, and in the context of the myriad of multi-faceted NUREG 0737 requirements placed upon our operating reactors, it is our belief that the current Company practices being employed to review TMI Task Action requirements and to make and carry out our commitments to them are adequate. We judge these practices to be timely, complete and attentive to the safety aspects intended by the NRC Staff requirements. In reviewing our "track record", we believe that, for the most part, our commitments have been completed in a timely manner, and when necessary, schedule delays have been properly identified and justified. Where difficulties have arisen in implementing the NUREG 0737 requirements or meeting our commitments, the NRC Staff and Region III have been promptly advised of such difficulties.

In preparation of our response to Generic Letters No. 82-05 and No. 82-10 concerning the implementation status of various NUREG 0737 items at our operating stations, our Nuclear Licensing Department requested and received documentation of the status of the various outstanding TMI commitments. The results of these reviews reaffirm our belief that our NUREG 0737 commitments (including Item II.B.4) are being adequately monitored and completed as committed by the Company. In addition to each station's method of tracking to insure that commitments are met, our Nuclear Licensing Department also provides monthly status reporting to Corporate and Station management of open NUREG 0737 items in order to maintain high visibility of our open commitments. This practice was initiated in May, 1981 and will continue as necessary until all NUREG-0737 items have been dispositioned.

In conclusion, we are confident in the adequacy of our existing program to implement the TMI Task Action requirements at our operating plants. We believe our program provides reasonable assurance that NUREG 0737 requirements and commitments are being and will continue to be met.

To the best of my knowledge and belief, the statements contained herein and in the Attachment are true and correct. In some respects these statements are not based upon my personal knowledge, but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

J. C. Keppler

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Please address any further questions that you or your staff may have concerning this matter to this office.

Very truly yours,

C. Reed

Cordell Reed
Vice-President

EDS/lm

Attachment

cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 18th day
of June, 1982

Nancy M. Pascerio
Notary Public

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

Dresden Station

Response to Dresden Station IE Inspection Report
Nos. 50-10/82-04, 50-237/82-06 and 50-249/82-06
Notice of Violation

Items of Noncompliance

1. 10 CFR 50, Appendix B, Criterion XII, requires that measures be established to assure gages used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits. The licensee's Quality Assurance Procedure Q.P. 12-52, requires the Master Instrument Mechanic to prepare lists and calibration schedules for instrumentation used for conformation to a limiting condition for operations. Also, the licensee's Quality Assurance Program, Section 12.7, requires that in the operation of generating stations, the equipment will be periodically calibrated or adjusted to assure that accuracy is maintained within necessary limits in order to verify design measurements.

Contrary to the above, while observing the surveillance testing of the Standby Liquid Control (SBLC) System on Unit 2, the resident inspector noticed that the flow indicator had not been calibrated. The surveillance procedure (DOS 1100-1) uses a rotometer flow indicator to verify the monthly surveillance requirement of "pump minimum flow rate of 39 GPM shall be verified against a system head of 1275 psig", in Paragraph 4.4.A.1 of the Technical Specifications. The flow indicator did not appear on the Master Instrument Mechanics prepared lists and scheduled calibration, nor was there any indication of when the last time the flow indicator had been calibrated.

Corrective Action Taken and Results Achieved

The noncompliance was reviewed by both the Technical Staff and Instrument Maintenance Departments. Since the test flow indicating device is a rotometer, calibration can only be accomplished through indirect means. The Technical Staff will review the system and develop a procedure for calibration of the SBLC test flow indicator.

Date When Full Compliance Will Be Achieved

The calibration of both the Unit 2 and Unit 3 SBLC test flow indicators will be completed by September 1, 1982. Subsequently, the respective SBLC test flow indicators will be calibrated each unit refueling outage.

Discussion

If the noncompliance described above results in the rotometer reading higher than the actual flow rate then the pump(s) might not be meeting the minimum flow requirements. However, this is judged not to be a concern for the following reasons:

- a) The rotometer is composed of two basic parts: a float and tapered cylinder. If either or both components were to wear, the rotometer would indicate a flow rate lower than the actual rate. This would be in the conservative direction, because the monthly flow test is verifying that the pumps are operating above a minimum flow rate.
- b) A review of all of the 1982 SBLC system pump tests revealed that the lowest average flow rate of the SBLC system pumps for both units was 44 gpm. If the rotometer calibration was off by 10% in the nonconservative direction, the minimum Tech Spec flow rate of 39 gpm would still be satisfied.
- c) Once per operating cycle, one of the two SBLC systems is actuated using the normal actuation switch, and clean demineralized water is pumped into the reactor vessel. During this test, pump minimum flow rate is verified and compared against a previous test at the same reactor vessel pressure. A review of past refueling outage test data indicates that the minimum pump flow rates have not been compromised.

There is no requirement in the Technical Specifications to specifically calibrate the SBLC pump flow test indicator. However, as stated above, calibration will be completed by September 1, 1982. Subsequently, the respective SBLC test flow indicators will be calibrated each refueling outage.

The only Technical Specification that could be affected by the noncompliance is the monthly SBLC pump operability requirement:

4.4.A.1 At least once per month - Demineralized water shall be recycled to the test tank. Pump minimum flow rate of 39 gpm shall be verified against a system head of 1275 psig.

However, as discussed above Dresden Station believes that it is in full compliance with the Technical Specification requirement.

2. 10 CFR 50.54(h) states that the licensee shall be subject to the provisions of the rules, regulations, and orders of the Commission. On July 10, 1981, the Commission issued an order confirming the licensee's commitments on Post-TMI related issues. Appendix A, of the subject order listed Item II.B.4, Training on Mitigating Core Damage with dates of January 1, 1981, for having available for review a training program for mitigating core damage and a date of March 1, 1981, for implementing the training program. Item II.B.4 of NUREG-0737, required training on mitigating core damage for (1) Shift Technical Advisors and operating personnel from the plant manager through the operations chain to the licensed operators, and (2) Managers and Technicians in the Instrumentation and Control (I&C), Health Physics, and Chemistry Departments shall receive training commensurate with their responsibilities.

Contrary to the above, while reviewing the licensee's training for Item II.B.4, the resident inspector found that the licensee's training program on mitigating core damage did not include I&C, health physics and chemistry personnel. In spite of this programmatic deficiency, the inspector observed that significant portions of these personnel as discussed in paragraph 14 of this report had been trained on the procedures for mitigating core damage commensurate with their responsibilities.

Corrective Action Taken and Results Achieved

The training of all Dresden Station licensed personnel was completed as of September 22, 1981, in accordance with NUREG 0737 requirements.

After reviewing the information presented in General Electric Company's "Degraded Core" training course and in the station procedure DGA-19, "Procedure to Assure Adequate Core Cooling," it was determined that no additional training above what was currently in place is required by the Instrument Maintenance Department personnel commensurate with their responsibilities.

Although some members of the Health Physics and Chemistry Departments had received training commensurate with their responsibilities, additional training was initiated to assure that all members were adequately trained. This training was completed as of May 28, 1982.

References (b) and (c) documented the above to the NRC Staff and Region III in response to Generic Letter No. 82-05.

Corrective Actions Taken To Avoid Further Noncompliance

In an effort to assure that all TMI Task Action Item requirements and commitments are adequately reviewed, a Technical Staff engineer has been specifically assigned the task of tracking all NUREG 0737 items. His responsibilities include assuring that all TMI Task Action Items are adequately addressed, commitment dates are met, and documentation is available to verify full compliance. All correspondence pertaining to NUREG 0737 items is sent directly to this individual by the Nuclear Licensing Administrator, in addition to the normal distribution copies sent to Dresden Station.

The Nuclear Licensing Administrator also provides a "NUREG 0737 Open Item Monthly Status Report" in an effort to identify Dresden Station commitments to the remaining NUREG 0737 open items along with their associated NRC submittal and implementation dates.

Dresden Station believes that the current methods employed to review TMI Task Action Item requirements and commitments are adequate.

Date When Full Compliance Will Be Achieved

All training as required by NUREG 0737, Item II.B.4 has been completed and Dresden Station believes it is now in full compliance.