

December 9, 1993

Docket No. 50-010
Docket No. 50-237
Docket No. 50-249

Commonwealth Edison Company
Dresden Nuclear Power Station
ATTN: Mr. M. D. Lyster
Site Vice President
6500 N. Dresden Road
Morris, IL 60450

Dear Mr. Lyster:

This refers to the inspection conducted by Messrs. Robert Lerch, Isa Yin and Ronald Langstaff of this office on October 20 through November 3, 1993. The inspection included a review of authorized activities for your Dresden Nuclear Power Station. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report. Additional telephone conversations were held between Mr. F. A. Maura of this office and the Commonwealth Edison Company QA staff on November 16, 17, 29, and 30, 1993.

The purpose of this inspection was to assess the quality control activities at the plant. The inspection consisted of interviews of plant employees and employees of Fluor Constructors International Inc. (Fluor), and reviews of a sampling of problem reports and procedures.

This inspection identified that independent verification of certain work activities is performed on a random or sampling basis. It is unclear how verification performed on a random or sampling basis meets regulatory commitments. We understand you will seek an interpretation concerning sampling from the American Society of Mechanical Engineers (ASME) Committee on Nuclear Quality Assurance. You are requested to provide the NRC with a copy of the interpretation within 30 days of receipt of the interpretation. In addition, you are also requested to provide your position on how regulatory commitments for performing inspections are met for those areas in which inspections are performed on a random or sampling basis.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The first violation involved weaknesses in your program for the control of measurement and test equipment (M&TE) regarding calibration reverification evaluations performed for lost, broken, or out-of-tolerance tools. These weaknesses included a lack of clear management expectations for the quality of these evaluations, incomplete documentation, numerous reviews and signatures which provided little benefit, and a lack of responsibility by the staff. The second violation represented a significant failure to assure the appropriate resolution of problems identified on Fluor quality control inspectors' observation reports.

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The quality verification organization failed to identify either of these problems despite audits conducted specifically in the M&TE area. Although some good findings were identified, the scope of the audits was limited in that the quality of M&TE evaluations was not included nor was the control of M&TE by site contractors.

The inspection also identified that the underlying message conveyed by management to the Site Engineering and Construction (SEC) organization and the Fluor International QC group, during the last outage, lacked appropriate balance between the production schedule and quality, which resulted in an adverse climate for procedure adherence and the identification of problems. A lack of involvement by station quality verification and quality control in outage work by Station Engineering and Construction appeared to be a contributor to the lack of balance between schedule and quality. It is requested that you respond in writing with your conclusions on this matter and any corrective actions you deem necessary.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, its enclosures, and your responses to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original signed by Mark A. Ring

Mark A. Ring, Chief
Operations Branch

Enclosures:

1. Notice of Violation
2. Inspection Reports
 - No. 50-010/93006;
 - No. 50-237/93030;
 - No. 50-249/93030

See Attached Distribution

RIII	RIII	RIII	RIII	RIII
----- [See Following Page]	-----	-----	-----	-----
Lerch/cg/jk	Langstaff	B. Burgess	Hiland	Ring
12/07/93	12/ /93	12/ /93	12/ /93	12/ /93

The quality verification organization failed to identify either of these problems despite audits conducted specifically in the M&TE area. Although some good findings were identified, the scope of the audits was limited in that the quality of M&TE evaluations was not included nor was the control of M&TE by site contractors.

The inspection also identified that the underlying message conveyed by management to the Site Engineering and Construction (SEC) organization and the Fluor International QC group, during the last outage, lacked appropriate balance between the production schedule and quality, which resulted in an adverse climate for procedure adherence and the identification of problems. Although no safety concerns were identified, a lack of involvement by station quality verification and quality control in outage work by Station Engineering and Construction appears to be a contributor. It is requested that you respond in writing with your conclusions on this matter and any corrective actions you deem necessary.

You are required to respond to this letter and should follow the inspections specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and an additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

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Mark A. Ring, Chief
Operations Branch

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RIII <i>RM</i>	RIII <i>Rad</i>	RIII <i>100</i>	RIII <i>P24</i>	RIII
Lerch/cg	Langstaff	B. Burgess	Hiland	Ring
12/6/93	12/6/93	12/7/93	12/7/93	12/ /93

Distribution

cc w/enclosures:

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bcc w/enclosures: PUBLIC-1501