



Commonwealth Edison
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Ward

August 16, 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: Additional Responses to Items of
Non-Compliance in I.E. Inspection
Report Nos. 50-237/82-07 and
50-249/82-07 dated June 7, 1982.

References (a): L. O. DelGeorge letter to J. G.
Keppler dated July 7, 1982.

(b): R. L. Spessard letter to Cordell
Reed dated July 21, 1982.

Dear Mr. Keppler:

Reference (a) transmitted our response to the apparent items of noncompliance which resulted from a special inspection conducted by Messrs. W. Shafer, J. Heller, A. Matteson, M. Parker, and D. Robinson on April 12-16, and April 19-23, 1982, of activities at Dresden Nuclear Power Station Units 2 and 3. Our response to those items of non-compliance indicated that, based on our understanding of the inspectors' concerns, noncompliance No. 2 and No. 3 in the inspection report were not warranted and should be withdrawn. These noncompliances concern the adequacy of Quality Procedure Q.P. 3-52 and the method it specifies for implementing Quality Assurance and/or Quality Control hold points, and the inspectors' concern for documentation of Maintenance personnel training.

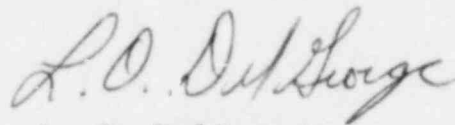
During telephone conversations with personnel of your office on July 16, 1982, (documented in Reference (b)), we obtained additional information to clarify these apparent items of noncompliance. Additionally, your staff requested supplementary information concerning our response to noncompliance No. 1 in the Inspection Report. Based on our current understanding of the items of noncompliance, we are providing additional information concerning noncompliance No. 1 and new responses to noncompliance Nos. 2 and 3 of the Inspection Report.

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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 on 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.

Please direct any questions you may have concerning this matter to this office.

Very truly yours,



L. O. DelGeorge
Director of Nuclear Licensing

lm

Region III Inspector, Dresden

SUBSCRIBED and SWORN to
before me this 16th day
of August, 1982


Notary Public

4764N

COMMONWEALTH EDISON COMPANY

ATTACHMENT

Response to Notice of Violation

Additional Response to Item No. 1 of Non-Compliance

The "program" referred to in our original answer is recognized to be the general employe Annual Retraining Program (DPP-15, "Periodic Training"). We felt that the material contained in this annual program had adequately addressed those retraining suggestions listed in ANSI N18.1, 1971, (Section 5.5.1), as they specifically pertained to our maintenance workers.

We have performed the survey committed to in our original response, and find that additional information on plans and procedures such as: DAP 2-8, "Deviation Report", DAP 9-2, "Procedures Preparations", and DAP 15-1, "Work Requests", can be construed as appropriate for our maintenance workers in order to ensure their understanding and participation in the policies discussed in these Administrative Procedures. As such, annual retraining on these items will be added to the program scheduled to begin in December, 1982, as well as to our initial Orientation Program for new employes.

In addition the DPP's on Maintenance training will be revised to include a specific written section on retraining commitments.

We believe that these changes will satisfy your concerns as expressed in our July 16, 1982, telephone conversation.

Amended Response to Item No. 2 of Non-Compliance

2. 10 CFR 50, Appendix B, Criteria II, states that the applicant shall establish a quality assurance program which complies with the requirements of 10 CFR 50, Appendix B.

Topical Report, CE-1-A was established to comply with these requirements. Paragraph 10 of the Topical Report identifies that an inspection program will be established to provide assurance that the quality control surveillance, inspection and tests defined in the specifications are performed. Quality Assurance inspection and testing will be conducted at the station during operations, maintenance and modification activities to verify quality. Inspection and test points will be established as required to assure quality of items and the effectiveness of the inspection program.

Contrary to the above, Quality Procedure, QP 3-52, allowed the Maintenance Department to proceed with safety-related and plant reliability-related maintenance activities without Quality Assurance and Quality Control authorization and approval, when Quality Assurance and/or Quality Control personnel were not on site and the work was routine type maintenance using approved procedures and methods. This practice bypassed Quality

Assurance and Quality Control's ability to establish and implement hold points, as hold points were not routinely written into procedures when originally approved. Review of work request revealed that 34 of about 150 routine work requests were completed while Quality Assurance and/or Quality Control personnel were offsite. Work was allowed to proceed without the implementation of hold points, as appropriate, to assure the quality of work being performed was adequate.

Discussion

As a result of discussions with Mr. Shaeffer on 7/16/82 to clarify the issue with respect to Item #2, this amended response is provided.

During this discussion, Mr. Shaeffer indicated the NRC recognized the importance of responding quickly to emergency work of routine or craft capability nature, with Quality Assurance and Quality Control reviewing the work after completion.

The primary concern is that the provision in the QP 3-52, which covers work of this nature, is being used to bypass the QA/QC coverage for work that does not qualify as urgent and routine (not complex).

Commonwealth Edison concurs that work requests bypassing QA/QC which do not qualify as urgent and uncomplicated are violations of the QA Program.

In as much as specific examples of work requests were mentioned in the exit interview, but not included in the inspection report, QA personnel have undertaken a review of work requests for which QA/QC have been bypassed prior to the start of work. This review included dates of issue, designated priority, designation of routine or craft capability, nature of the work and an independent evaluation of the complexity of the work, in order to verify compliance with the Quality Assurance Program.

This evaluation did reveal a number of work requests for which QA/QC were bypassed which were not in strict compliance with the provisions of the note for emergency work of a routine nature. Of the 35 work requests examined, only 1 appeared to be of a complex nature and QA would normally have applied a hold point. Six other work requests were of a routine nature, but the work was actually conducted a day or two later and thus did not qualify to bypass QA/QC. However, it was noted in all cases that operations performed a test to verify the acceptability of the work.

On the basis of this review, it has been determined that changes are needed to the Station Administrative Procedure for work requests, and the QA training/retraining program for work request procedures in order to ensure that QA/QC are provided an opportunity to insert hold points in safety-related work packages.

Corrective Action Taken and Results Achieved

1. For the work requests completed in the past, additional action is not necessary because an operability test was performed following the work and there is no question as to the acceptability of that work.
2. The Note in QP 3-52 which describes this provision has been carefully reviewed, and it appears that all essential elements were clearly described and no revisions are needed.

Corrective Action Taken to Avoid Further Noncompliance and Date of Full Compliance

1. The Station Administrative Procedure for work requests will be revised to clarify the conditions under which QA/QC can be bypassed for emergency work of a routine nature. Shift Engineers will be made aware of these changes through the weekly required reading book. These changes will be issued by December 31, 1982.
2. It will be the policy of the station to attempt to reach QA/QC for emergency work whether of a routine nature (non-complex) or not. Quality Assurance and Quality Control have provided a call list to facilitate this effort for the Shift Supervisor. If the station cannot reach the QA/QC personnel, work may proceed in accordance with QP 3-52.
3. The QA lesson plan for initial training will be upgraded to clarify the provision for the conduct of emergency, non-complex work, and the need to give the QA/QC groups the opportunity to place hold points. These changes will be in place by September 1, 1982.

Amended Response to Item No. 3 of Noncompliance

3. 10 CFR 50, Appendix B, Criteria II, states that the applicant shall establish a Quality Assurance program which complies with the requirements of this Appendix, and that this program shall be documented in written procedures, and shall be carried out.

Topical Report CE-1-A, Section V states: "Generating station operations, procedures, and instructions, will be provided by the Station Superintendent and will be included in the Station Procedures Manual in a timely manner consistent with NRC license requirements for administering the policies, procedures, and instructions from the time that the operating license is issued through the life of the station; that these procedures and instructions include, Administrative Procedures."

Contrary to the above, on-the-job training was not being documented as required by Dresden Personnel Procedure DPP-13, "Training Records." A review of training records for 15 selected personnel revealed that on-the-job training had not been documented for these personnel since 1978.

Corrective Action Taken and To Be Taken to Further Noncompliance

As a result of a clarifying telephone conversation with your office on July 16, 1982, we understand that compliance may be achieved by revising the Dresden Personnel Procedure DPP-13, "Training Records", to be more precise in our expectations of on-the-job training documentation. The procedure, DPP-13, has been revised as follows:

Section B.2.d previously stated that "documentation of on-the-job training is the responsibility of each individual department." We have submitted a procedure revision to change this section to read: "documentation of on-the-job training, where OJT is an integral part of an approved written training program is expected to be accomplished through the cooperation of the training department and the applicable trainees' department."

We believe that this revision clarifies the policy established by station management to correctly document all required on-the-job training, while still providing the individual station departments the flexibility of not requiring documentation for on-the-job training which is conducted but not required by regulations, standards, and policies.

Date of Full Compliance

The procedure revision has been prepared and submitted for On-Site Review. We currently anticipate that the revision will be issued for use by September 24, 1982.