U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-010/82-12(DPRP); 50-237/82-16(DPRP); 50-249/82-17(DPRP)

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

Licensee: Commonwealth Edison Company
P.O. Box 767
Chicago, IL 60690

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

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: June 5 - July 7, 1982

Inspectors: R. D. Walker for T. M. Tongue 7-29-82

R. D. Walker for M. J. Jordan 7-29-82

J. M. Peschel 7/29/82

Approved By: R. D. Walker, Chief 7-29-82
Reactor Projects Section 1C

Inspection Summary

Inspection on June 5 - July 7, 1982 (Report No. 50-010/82-12(DPRP); 50-237/82-16(DPRP); 50-249/82-17(DPRP))
Areas Inspected: Routine unannounced resident inspection of licensee action on previous inspection findings, Operational Safety Verification, Monthly Maintenance Observation, Monthly Surveillance Observation, Review of Plant Operations, and Inspection During Long Term Shutdown. The inspection involved a total of 94 inspector-hours onsite by three NRC inspectors including 38 inspector-hours onsite during offshift.
Results: Of the six areas inspected, there were no items of noncompliance identified.

## DETAILS

## SECTION I

1. Persons Contacted

*D. Scott, Station Superintendent
*R. Ragan, Operations Assistant Superintendent
J. Eenigenburg, Maintenance Assistant Superintendent
*D. Farrar, Administrative Services and Support Assistant Superintendent
J. Brunner, Technical Staff Supervisor
*J. Wujciga, Unit 1 Operating Engineer
*J. Almer, Unit 2 Operating Engineer
*M. Wright, Unit 3 Operating Engineer
D. Sharper, Acting Waste Systems Engineer
G. Myrick, Rad-Chem Supervisor
B. Saunders, Station Security Administrator
B. Zank, Training Supervisor
*E. Wilmer, Q.A. Coordinator

The inspector also talked with and interviewed several other licensee employees, including members of the technical and engineering staffs, reactor and auxiliary operators, shift engineers and foremen, electrical, mechanical and instrument personnel, and contract security personnel.

*Denotes those attending one or more exit interviews conducted on June 14 and July 7, 1982.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (237/81-06-01; 249/81-04-01(DPRP))

Failure to implement portions of ANSI N18.7-1976. Topical Report CE-1-A was revised to clarify the commitment of older Commonwealth Edison nuclear plants to the revision of ANSI N18.7 which was effective at the time that the operating license was issued for that plant. In the case of the Dresden Station, the applicable revision of ANSI N18.7 was the 1972 edition. As a consequence, examples of this noncompliance concerning the preventive program, the fluid system cleanliness program, and the housekeeping program are no longer applicable.

(Closed) Unresolved Item (237/81-15-03; 249/81-09-03(DPRP))

Qualifications of Offsite Review Group (ORG) members in the Reactor Operations discipline were ambiguous. Qualifications for this discipline were revised in order to clarify the requirements for experience as a reactor operator. Procedures now require five years experience in reactor operations/NPP operations and experience as a reactor operator.

(Closed) Unresolved Item (237/81-15-04; 249/81-09-04(DPRP))

Newly hired buyers or Purchasing Agents are not administratively prohibited from working on QA related purchase orders until having received QA training. A memo issued on June 11, 1981, by N. E. Wandke prohibits new buyers from committing purchase orders for safety related and/or ASME code requirements until completing the Indoctrination and Training Program for buyers.

(Closed) Unresolved Item (237/81-15-01; 249/81-09-01(DPRP))

Procedural discrepancies. The licensee has revised Quality Procedure No. 4-51, removing the statement that the buyer authorizes shipment for use and installation. The licensee also revised Quality Procedure No. 15-51, removing the engineering disposition requirements and the deferring of the hold tag. The new procedures are Quality Procedure No. 4-51, May 15, 1981, Revision 11, Procurement Document Control for Operations - Processing Purchase Documents; and Quality Procedure No. 15-51, May 15, 1981, Revision 10, Nonconforming Materials, Parts and Components for Operations - Spare Parts and Materials.

(Closed) Open Item (237/81-15-02; 249/81-09-02(DPRP))

Lack of uniform or standard criteria for determining the technical acceptability of a vendor or supplier. The licensee has developed SNED Procedure Q-41, Technical Evaluation of Vendors, to establish the criteria for technical review of vendors. A review of vendor reviews showed that the procedure was being followed and the records were being retained.

(Closed) Unresolved Inspection Item (50-237/81-03-01(DPRP))

Inadvertant opening of a S/R valve while moving fuel. The licensee modified Dresden Operating Procedure DOP 1900-3 "Reactor Cavity - Dryer Seperator Storage Pit Fill and Operation of the Fuel Pool Cooling and Clean-Up System During Refueling", by adding a precaution where blank flanges (pancakes) should be installed in the S/R valve inlet or outlet flange or other means should be employed to prevent a loss of water from the fuel pool or reactor vessel by inadvertant operation of the S/R valve operator.

(Closed) Open Inspection Item (50-10/81-07-01(DPRP))

Verification of water level in the Unit 1 steam drum. The licensee has written and properly implemented a routine surviellance procedure (Unit 1 DIS-260-1). This procedure verifies that steam drum water level is as indicated and is being conducted quarterly.

3. Operational Safety Verification

The inspectors observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the period of June 5 through July 7, 1982. The inspectors verified the operability of selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of Units 2 and 3 reactor buildings and turbine buildings were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

The inspectors observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the period of Une 5 through July 7, 1982, the inspectors walked down the accessible portions of the Unit 2 Emergency Diesel Generator, Standby Liquid Control, HPCI; Units 2/3 Emergency Diesel Generator; Unit 3 Emergency Diesel Generator, Standby Liquid Control, HPCJ, LPCJ, and Core Spray systems to verify operability. The inspector also witnessed portions of the radioactive waste system controls associated with radwaste shipments and barreling.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under technical specifications, 10 CFR, and administrative procedures.

While the S.R.I. was conducting a routine walkdown of control room panels on June 10, 1982, with a licensee Q.A. auditor, a discrepency was noted in the scale of the recorder and instruments for the Area Radiation Monitors (ARM's). The ARM scales show units in mrem/hr with 4 decade ranges of 0.01 to 100, 0.1 to $10^3$ and 1 to $10^4$, and one ARM with a 5 decade scale ranging from 10 to $10^6$. It was noted that the ARM recorder scale is from 0.1 to $10^3$ mrem/hr and all associated instruments and recorders are logarithmic. This could give an error of a factor of 10 or greater in the value indicated on the recorder chart versus the actual ARM reading. The Q.A. auditor immediately wrote and submitted a discrepency report to the station superintendent. This is significant in that the recorder values could be used to evaluate the severity of the event or it may be used for historical purposes. The station management agreed to review this matter and consider alternative resolutions. It is noted that these recorders have been installed on the 902(3)-2 panels within the past 1 1/2 years with a feature to permit bypassing a specific ARM alarm and still retain the alarm function on the 902(3)-3 panels for the remainder of the ARM's. This is open inspection item 50-237/82-16-01 and 50-249/82-17-01(DPRP).

No items of noncompliance were identified.

4. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with technical specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

Unit 3 Emergency Diesel Generator
Units 2/3 Emergency Diesel Fire Pump

Following completion of maintenance on the above named items, the inspectors verified that these systems had been returned to service properly.

5. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Unit 2 HPCI Turbine Trip on Low Reactor Pressure and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

No items of noncompliance were identified.

6. Review of Plant Operations:

Emergency Preparedness

The Senior Resident Inspector observed licensee emergency drills on June 10, 1982 and on June 15, 1982 (offshift). The Resident Inspector observed a licensee emergency drill on June 29, 1982 (offshift). The inspectors observed licensee actions from the control room and verified that proper communications were carried out, appropriate reports were made, evaluations of data were acceptable, declaration of the severity of emergencies was correct and timely, and corrective actions were acceptable. The inspectors also verified that the licensee's method of identifying and correcting descrepencies is adequate and that disrupted equipment was returned to it's proper location after the drills.

The drill conducted on June 29, 1982, was also the licensees off hours, annual emergency exercise with observers and participants from the NRC Region III office, Federal Emergency Management Administration, State of Illinois, local emergency response agencies and the CECo corporate office. A more extensive evaluation of that drill will be discussed in NRC Inspection Report 50-010/02-11, 50-237/82-15, and 50-249/82-16.

No items of noncompliance were identified.

7. Inspection During Long Term Shutdown

The inspectors observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the period of June 5 through July 7, 1982. The inspectors verified surveillance tests required during the shutdown were accomplished, reviewed tagout records, and verified applicability of containment integrety. Tours of Unit 1 accessible areas, including exterior areas were made to make independent assessments of equipment conditions, plant conditions, radiological controls, safety, and adherence to regulatory requirements and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector observed plant housekeeping/cleanliness conditions, including potential fire hazards, and verified implementation of radiation protection controls. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

No items of noncompliance were identified.

8. Meetings, Training and Offsite Functions

During this inspection report period, the Senior Resident Inspector was on military leave for ten working days. The Resident Inspector was on a special assignment at the LaSalle Nuclear Station and in Region III for eight working days. In addition, the Resident In-

spector attended a Region III Resident Inspectors seminar on June 30, 1982 through July 2, 1982, in Saint Charles, Illinois.

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on July 7, 1982, and summarized the scope and findings of the inspection activities. The licensee acknowledged the findings of the inspection.