



**Commonwealth Edison**

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September 13, 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 Unit 3  
Response to Items of Noncompliance  
in I.E. Inspection Report No.  
50-249/82-08  
NRC Docket No. 50-249

Reference (a): C. E. Norelius letter to Cordell  
Reed dated July 29, 1982.

Dear Mr. Keppler:

Reference (a) provided the results of a routine safety inspection conducted by Messrs. I. Jackiw, F. Maura, and D. Robinson, of your office on April 20, 22-25, and May 10 and 21, 1982, of activities at our Dresden Nuclear Power Station Unit 3. During that inspection, certain activities appeared to be in non-compliance with NRC requirements.

The first item of non-compliance apparently resulted from our continuing attempts to shorten the duration of containment integrated leakage rate tests to less than 24 hours, provided we obtain NRC concurrence as specified in ANSI Standard N45.5-1972. We are continuing to seek your concurrence with these shorter tests. However, the actual integrated leak rate test which was conducted for Dresden Unit 3 on April 24 and 25, 1982, extended for more than 24 hours in accordance with ANSI N45.4-1972, and Dresden approved procedure DTS 1600-7, Rev. 4. Because a short duration test was not conducted, there was no need for DTS 1600-7 to specify a leakage calculation method which is in agreement with the technique specified in the Bechtel Topical Report BN-TOP-1. We believe, therefore, that the apparent item of noncompliance is inappropriate and should be withdrawn.

The second item of non-compliance specifies that calibration records were not available for the flow meter that was used during the induced leakage phase of the integrated leak rate test. The flow meter had been recalibrated by the vendor shortly before the test was conducted. We acknowledge that the time delays in obtaining a typed version of the calibration certificate from the vendor did not permit us to have a formal calibration document available for the inspectors'

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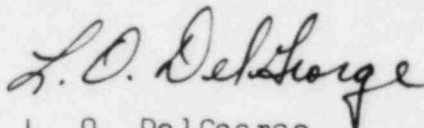
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review during the test. However, the inspectors were shown the handwritten copy of the calibration data supplied to us by the vendor. We have also now received the typed version of that certificate of calibration. Therefore we believe that we have been and remain in compliance with 10 CFR 50, Appendix B, Criterion XVII, which requires that sufficient records be maintained to furnish evidence of activities affecting safety. We believe that an "open item" for subsequent review by your inspectors would have been more appropriate to document the concerns raised at the time of this inspection, and that the apparent item of non-compliance should be withdrawn.

Please address any questions that you or your staff may have concerning this matter to this office. The date for submitting this response was discussed with Mr. W. Little of your office in an August 27, 1982, telephone conversation.

Very truly yours,



L. O. DelGeorge  
Director of Nuclear Licensing

TJR/lm

Attachment

4997N

COMMONWEALTH EDISON COMPANY

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

The items of non-compliance identified in Appendix A of the NRC letter dated July 29, 1982, are responded to in the following paragraphs:

Item of Non-Compliance

1. 10 CFR 50, Appendix J, requires that all Type A tests shall be conducted in accordance with the provisions of ANSI N45.4-1972. ANSI N45.4-1972 requires a leakage rate test period of 24 hours unless it can be demonstrated to the satisfaction of those responsible for the acceptance of the containment structure that the leakage rate can be accurately determined during a shorter term period. BN-TOP-1, Revision 1, dated November 1, 1972 (Bechtel Corporation's Topical Report) is the only short-term duration, general test method, which has received NRC's approval. BN-TOP-1, Revision 1, requires that the data analysis be based on the total time calculations based on the ANSI N45.4 formulas.

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed and accomplished in accordance with documented procedures which include appropriate quantitative or qualitative acceptance criteria for determining that the activities have been satisfactorily accomplished.

Contrary to the above, on April 24, 1982, the licensee was ready to terminate the leakage rate data acquisition phase and start the verification phase after approximately six hours of data acquisition, based on the mass plot calculations which are not in accordance with ANSI N45.4-1972, paragraph 7.9, and BN-TOP-1, Revision 1, Section 6. Before the start of the test, the licensee was aware that in order to perform a short duration ILRT, he had to calculate the leakage rate based on the total time equations of ANSI N45.5 and BN-TOP-1.

In addition, test procedure DTS 1600-7, Revision 4, was inadequate in that it failed to address the requirements for performing a short-term duration CILRT, and personnel performing the test were not properly indoctrinated and trained to assure proficiency in the performance of short-term duration CILRT.

Discussion

On April 24 and 25, 1982, a containment integrated leak rate test was conducted for Dresden Unit 3 in accordance with Dresden approved procedure DTS 1600-7, Revision 4. The test was conducted over a period greater than 24 hours, which exceeds the testing time specified in ANSI N45.4-1972, and 10 CFR 50, Appendix J. The calculational method specified in DTS 1600-7 is the mass plot calculation which is an acceptable

method and has previously been reviewed and approved by your staff for containment integrated leakage rate tests which extend for a 24-hour duration. Further, because the test did extend for 24 hours, DTS 1600-7, Revisior 4, did not need to address the requirements for performing a short duration test, and personnel performing the test did not need to be indoctrinated and trained to ensure proficiency in the performance of a short duration test. Therefore, we see no basis for a non-compliance to 10 CFR 50, Appendix B, Criterion V, and believe that this non-compliance should be withdrawn.

The issues raised in the non-compliance apparently concern our intent to conduct a short duration test without incorporating the total-time equations which are specified in Bechtel Topical Report BN-TOP-1, Revision 1. That calculational method is not included in the Commonwealth Edison integrated leak rate test computer program because we had not been informed until just prior to the test that we needed to comply with the Bechtel Topical Report for a short duration test. We are unaware of any official NRC document including 10 CFR 50, Appendix J, any Regulatory Guide, or Technical Specifications, which promulgates the Bechtel Topical Report as the only acceptable method of a short duration test. We have now reviewed the Bechtel Topical Report, however, and are incorporating the calculational techniques into our computer program.

However, in this instance, a 24 hour test was conducted in accordance with approved standards and procedures, and in our judgment this apparent item of non-compliance should be withdrawn.

Item of Non-Compliance

2. 10 CFR 50, Appendix B, Criterion XII requires that instruments and other testing devices used in activities affecting quality be properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits. Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting safety. The records shall include qualification of equipment.

Contrary to the above, calibration records for the flowmeter used during the verification phase of the leakage rate test were not available at the site while the flowmeter was being used.

Discussion

The flowmeter used during the verification phase of the leakage rate test had been calibrated on January 19, 1982, using instruments traceable to NBS Standards with the calibration period valid for six months. On April 13, 1982, a second calibration was performed by the vendor who was on site for other work associated with the integrated leak rate test. This second calibration was performed in the same manner as the original and resulted in minor changes to the previous calibration.

Because the calibration was performed so close to the beginning of the integrated leak rate test, the vendor was unable to provide us with a typed version of the certificate of calibration for the flowmeter prior to the actual test. However, the vendor did provide us with a handwritten version of the calibration information, and this information was available for review by the inspectors during the test.

We have now received the formal typed certificate of calibration for the flowmeter. We believe that we are in compliance with Criterion XVII in that we have sufficient records to furnish evidence of activities affecting safety.

We believe that the apparent item of non-compliance was issued prematurely in this instance and in our judgment should be withdrawn.

Item of Non-Compliance

3. Technical Specification 6.2.A states that detailed written procedures addressing surveillance and testing requirements shall be prepared, approved, and adhered to. Station procedure DTS 1600-7, Revision 4, required that valve MO-3-1402-25A be in the closed position and valves SO-3-2301-29 and SO-3-2301-30 be in the open position during the performance of ILRT.

Contrary to the above, three valves, MO-3-1402-25A, SO-3-2301-29, and SO-3-2301-30, were found in positions other than those specified by the procedure.

Corrective Action Taken and Results Achieved

For reasons discussed below, the test was conducted in the intended manner and immediate corrective actions were not necessary, however, a temporary procedure change was written to document the acceptable position of valves SO-3-2301-29 and SO-3-2301-30.

Corrective Action Taken to Avoid Further Non-compliance

In accordance with Dresden approved procedure DTS 1600-7, certain valving arrangements are made prior to conducting an integrated leak rate test to assure the test is conducted properly. A checklist is attached to the procedure to specify the "desired position" of these valves prior to the test. All valves on the checklist were placed in the proper position and were independently verified to be in that position. Then, caution cards were attached to the valves to indicate that they were placed in that position for the integrated leak rate test. However, the position of valve MO-1402-25A was changed during the test because it was used as the means to maintain, as required by the procedure, reactor water level at 50 inches instrument level. To ensure there is no confusion in the procedure, a section will be added which specifies the normal makeup method of maintaining a constant reactor vessel water level using the MO-1402-25A valve. Also, the checklist will be changed to indicate that the valve is "normally closed" as opposed to just "closed".

Valves SO-3-2301-29 and SO-3-2301-30 automatically isolated on high containment pressure (greater than 2 pounds pressure) during containment pressurization. We are preparing a permanent change to the procedure to vent the 2304 piping downstream of the isolation valves during the test. The position of these valves before or during the test in no way invalidated the test results.

Date When Full Compliance Will Be Achieved

The procedure changes described above will be made prior to the date when the next containment integrated leak rate test is conducted at Dresden Station.