



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

October 28, 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. 50-10/82-13, 50-237/82-17, and
50-249/82-18
NRC Docket Nos. 50-10/237/249

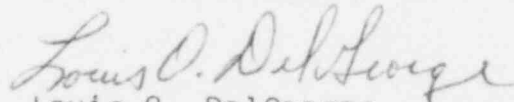
Reference (a): J. F. Streeter letter to Cordell Reed
dated September 28, 1982

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 July 8 through August 9, 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.

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

Very truly yours,


Louis O. DelGeorge
Director of Nuclear Licensing

Attachment

cc: RIII Inspector - Dresden

5338N

Commonwealth Edison Company

Attachment A
Response to Notice of Violation

The item of non-compliance identified in Appendix A of the NRC letter, dated September 28, 1982, is responded to in the following paragraphs:

10 CFR, Part 50, Appendix B, Criterion XI requires, in part, that procedures be developed for testing to demonstrate that systems and components will perform satisfactorily in service. Criterion XIV requires, in part, that measures be established to indicate the status of tests performed on individual items and to identify items which have satisfactorily passed required testing. Procedure Q.P.3-51 implements the requirements of Criterion XI for modifications and requires the Technical Staff Supervisor to assure test procedures are provided.

Contrary to the above:

- a. A procedure for an air pressure test was not issued and the test was therefore never performed for the portion of the containment water level monitor (NUREG-0737, Task Action Item II.F.1, Attachment 5) installed in 1982. The installation document prepared and processed per procedure Q.P.3-51 required such a test and was erroneously signed as having been accomplished.
- b. The test status was not indicated or identified for items which passed an air pressure test in 1980. This inadequacy contributed to the test described in a. above being erroneously identified as having been completed.

Corrective Actions Taken and Results Achieved

The water leg portion of the torus level modification which could not be documented as having been tested was visually examined to verify that no leakage exists. This constitutes an in-service leak test which is in compliance with the code of construction applicable to this modification. The results of this test indicated no leakage and will be included in the modification package. The portion of piping in the air leg between valves which were tested and the level transmitter did not require a test. This test exclusion is permitted by ASME Code, Section XI, Paragraph IWA 4400.

We believe that these actions ensure that no degraded equipment has been put into service as a result of this non-compliance.

Correction Action Taken to Avoid Further Non-Compliance.

The root cause of the non-compliance was a failure to properly indicate a change to a modification work traveler. Also, because the modification was completed in two parts, the probability of confusion over what testing was required increased. In order to reinforce the requirements for both test

procedures and documentation of changes that occur, a training session will be given to Technical Staff Modification Group, Quality Control Group, and Maintenance Staff, Substation Construction Foremen, and Station Construction personnel.

Date When Full Compliance will be Achieved

The modification training session will be completed by December 10, 1982.