

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-010/83-05(DPRP); 50-237/83-05(DPRP); 50-249/83-04(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: January 4 through February 2, 1983

Inspectors: *Roger D. Walker for*
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R. D. Walker, Chief 2-23-83
Projects Section 2C

Inspection Summary

Inspection on January 4 through February 2, 1983 (Report No. 50-10/83-05(DPRP); 50-237/83-05(DPRP) and 50-249/83-04(DPRP)

Areas Inspected: Routine, unannounced inspection by resident inspectors of operational safety; surveillance; Licensee Event Reports; plant trips; refueling activities; surveillance-refueling; maintenance-refueling; inspection during long term shutdown; preparation for a strike; independent inspection related to Technical Specification review, licensee personnel changes, and allegations. The inspection involved a total of 136 inspector-hours on site by three NRC inspectors including 29 inspector-hours on site during off-shifts.

Results: Of the twelve areas inspected, no items of noncompliance or deviations were identified in eleven areas; one item of noncompliance was identified in one area (failure to have current copies of Technical Specifications available - Paragraph 11).

DETAILS

SECTION I

1. Persons Contacted

Station Personnel

- *D. Scott, Station Superintendent
- R. Ragan, Operations Assistant Superintendent
- *J. Wujciga, Assistant Superintendent for Administrative Services and Technical Support and past Unit 1 Operating Engineer
- J. Eenigenburg, Maintenance Assistant Superintendent
- J. Brunner, Technical Staff Supervisor
- *M. Wright, Unit 1 Operating Engineer and past Unit 3 Operating Engineer
- *J. Almer, Unit 2 Operating Engineer
- *T. Ciesla, Unit 3, Operating Engineer and past Assistant Technical Staff Supervisor
- R. Rybak, Assistant Technical Staff Supervisor
- T. Blackman, Past Procedures Manager
- S. Young, Procedures Manager
- D. Sharper, Acting Waste Systems Engineer
- G. Myrick, Rad-Chem Supervisor
- B. Saunders, Station Security Administrator
- L. Williams, Q. A. Coordinator
- *R. Stobert, Q. A. Inspector

Corporate Personnel

- D. Farrar, Nuclear Licensing Administrator and past Assistant Superintendent for Administrative and Technical Services
- T. Rausch, Nuclear Licensing Administrator for Boiling Water Reactors
- G. Abrell, Director of Quality Assurance-Operations

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 January 21, 25, and February 2, 1983, and informally at various times throughout the period.

2. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the period of January 4 through February 2, 1983. The inspector 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 inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the inspection, the inspector walked down the accessible portions of the below listed systems to verify operability:

a. Unit 2

The Emergency Diesel, Isolation Condenser, and Standby Liquid Control System

b. Unit 3

The Emergency Diesel, Isolation Condenser, and Standby Liquid Control System

c. Unit 2/3 (Common)

Unit 2/3 Emergency Diesel Generator and the Standby Gas Treatment System

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.

No items of noncompliance or deviations were identified in this area.

3. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Unit 3 source range monitor rod block and calibration check, and the intermediate range monitor rod block/scram calibration check 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 or deviations were identified in this area.

4. Licensee Event Reports

(Open) LER 50-237/83-10(DPRP) Indication Discovered During Inservice Inspection

The licensee identified several locations on Unit 2 recirculation system piping where indications by ultrasonic testing showed possible rejectable results. This matter will remain open until the entire test, evaluation, and action plan are complete. This matter is also being followed by a Region III piping, nondestructive testing expert and will be the subject of a separate report.

Since the first indication was properly reported per technical specifications, it was evident to the inspectors and the licensee that a number of separate LER's could be generated prior to the completion of the test program. In order to minimize paper work, and simplify licensee reporting and NRC review effort; it was agreed that the licensee would commit to a supplemental LER with the first report. The supplement would be a complete summary of all of the rejectable findings of that series of tests on the recirculation piping. With the information in one package, subsequent retrieval and reference problems will be minimized.

It was further agreed that, as rejectable findings are detected, the licensee will make verbal reports to either the resident inspectors or the Region III specialist following the project.

In a further effort to help reduce paper work and simplify reporting, it was agreed that the licensee would use the same technique for containment local leak rate testing during refuel outages and any other programs where a single LER could be generated with the first reportable finding and a commitment to submit a supplemental LER as an overall summary of the project or test series findings. In addition, the resident inspectors or cognizant regional inspectors, would be kept informed personally or telephonically by the licensee as to the findings as the program progresses.

No item of noncompliance or deviations were identified in this area.

5. Plant Trips

Following the plant trip on Unit 2 on January 8, 1983 the inspector ascertained the status of the reactor and safety systems through discussions with licensee personnel concerning plant parameters, emergency system status and reactor coolant chemistry. The inspector verified the establishment of proper communications and reviewed the corrective actions taken by the licensee.

All systems responded as expected, and the plant was retained in a shutdown condition in order to start the planned refueling and maintenance outage.

No items of noncompliance or deviations were identified in this area.

6. Refueling Activities

The inspector verified that prior to the handling of fuel in the core on Unit 2, all surveillance testing required by the technical specifications and licensee's procedures had been completed; verified that during the outage the periodic testing of refueling related equipment was performed as required by technical specifications; observed 6 shifts of the fuel handling operations (removal and inspection) and verified the activities were performed in accordance with the technical specifications and approved procedures; verified that containment integrity was maintained as required by technical specifications; verified that good housekeeping was maintained on the refueling area; and, verified that staffing during refueling was in accordance with technical specifications and approved procedures.

No items of noncompliance or deviations were identified in this area.

7. Surveillance - Refueling

The inspectors observed the 250 volt dc battery discharge test and fuel sipping surveillance testing on Unit 2 to verify that the tests were covered by properly approved procedures; that the procedures used were consistent with regulatory requirements, licensee commitments, and administrative controls; that minimum crew requirements were met, test prerequisites were completed, special test equipment was calibrated and in service, and required data was recorded for final review and analysis; that the qualifications of personnel conducting the test were adequate; and that the test results were adequate.

No items of noncompliance or deviations were identified in this area.

8. Maintenance - Refueling

The inspector verified maintenance procedures include administrative approvals for removing and return of systems to service; hold points for inspection/audit and signoff by QA or other licensee personnel; provisions for operational testing following maintenance; provisions for special authorization and fire watch responsibilities for activities involving welding, open flame, and other ignition sources; reviews of material certifications; provisions for assuring LCO requirements were met during repair; provisions for housekeeping during and following maintenance; and responsibilities for reporting defects to management.

The inspector observed the maintenance activities listed below and verified work was accomplished in accordance with approved procedures and by qualified personnel.

Unit 2

Fuel Removal, Control Rod Unlatching, Control Rod Swapping, and the Scram Discharge Volume Hydrolaze/Dose Reduction - effectiveness.

No items of noncompliance or deviations were identified in this area.

9. Inspection During Long Term Shutdown

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the period of January 4 through February 2, 1983. The inspector verified surveillance tests required during the shutdown were accomplished, reviewed tagout records, and verified applicability of containment integrity. Tours of Units 1 and 2 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. The inspector reviewed the licensee's jumper/bypass controls to verify there were no conflicts with technical specifications and verified the implementation of radioactive waste system controls.

No items of noncompliance or deviations were identified in this area.

10. Preparation for a Strike

On January 10, 1983, the licensee received word of potential picketing by the local Boilermakers union over a dispute related to their work being conducted on site by other trades. Since there is an unusually large number of contractor employees on site for the Unit 2 outage, the licensee tested an alternate method of gaining access to the plant for contractor personnel in the event pickets were set up at the normal entrance. The inspectors observed this action as well as verified that contingency plans were available to be implemented to prevent disruption of normal plant access by licensee operating and support personnel. Subsequently, picket lines were not established; however, licensee awareness, planning and preparation was good.

No items of noncompliance or deviations were identified in this area.

11. Independent Inspection Effort Technical Specification Review

While reviewing the resident inspectors (R.I.) Technical Specifications, the inspector found a difference between the licensee and the R.I. versions. This prompted an audit by the R.I. staff comparing a controlled licensee version of the Technical Specifications to the R.I. version. During this audit, it was found that Amendment number 71, dated May 13, 1982, for Unit 2, had not been placed in the licensee's copies of the Technical Specifications on site. This was verified by review of controlled copies of the Technical Specifications in the control room, shift engineer's office, technical support center, station superintendent's office and the station quality assurance office. Telephone conversations with the Commonwealth Edison

Company (CECo) Corporate office revealed that the Corporate Nuclear Licensing Administration (NLA) office and the Corporate Quality Assurance office had the correct change in place in their versions.

The NLA for boiling water reactors stated that he had issued an order to distribute that change; however, there is no evidence of that document arriving on site in the manner that other changes are executed. In addition, traveler sheets are attached to such documents for signatures and returned to the NLA when the changes are entered in the appropriate books. Apparently there is no followup to verify that these traveler forms are returned as required. In addition, this is not routinely inspected during quality assurance inspections at the site as well as at the corporate level. This is an item of noncompliance with 10 CFR 19.11. (50-10/83-05-01(DPRP), 50-237/-05-01(DPRP), and 50-249/83-04-01(DPRP)).

Indications are that this was a clerical error and may have been caused by new clerical personnel. If this is the case, it has the appearance of a similar problem that was identified previously, where corporate documents related to inferior parts for safety related applications were not received on site. Reference inspection report 50-237/82-20(DPRP), 50-249/82-21(DPRP), 50-254/82-16(DPRP) and 50-265/82-18(DPRP). It appears evident that when clerical personnel can affect the safety performance of a station, controls should be established to clarify their instructions or training as well as some technique to verify followup of their actions should be implemented.

It is interesting to note that change number 71 is related to a one month test conducted on Dresden Unit 2 where gaseous hydrogen was added to the reactor feed water system as a technique to help arrest corrosion cracking problems. When the test was conducted, (reference NRC inspection report number 50-010/82-06(DPRP), 5037/82-10(DPRP), and 50-249/82-11(DPRP)) the inspector verified that the conditions of Amendment number 71 were followed by the licensee even though the actual change had not been placed in the Technical Specifications.

One item of noncompliance was identified in this area.

12. Licensee Personnel Changes

During this inspection period, an unusually large number of personnel changes occurred at the Dresden site. The changes occurred at nearly all management levels and some are; the assistant Superintendent for Administrative and Technical Services moved to Commonwealth Edison Company (CECo) Corporate and was replaced by the Unit 1 Operating Engineer; the Unit 3 Operating Engineer was moved to the position of Unit 1 Operating Engineer; and the assistant Technical Staff Supervisor was moved to the position of Unit 3 Operating Engineer; and, in addition, the second assistant Technical Staff Supervisor was transferred to the Corporate offices. It is recognized that two recently promoted Shift Control Room Engineers/Shift Technical Advisors (SCRE/STA) were moved

to the Technical Staff to help replace the transferred assistant Supervisors; however, they are lead engineers on Units 2 and 3. This new concept differs in that the previous assistant Technical Staff Supervisors had overall plant responsibilities rather than the Unit specialists. Other moves included exchanging the lead Health Physicist and the lead Chemist, creating five new rad-chem foremen positions, and changing the Procedures Manager.

There were additional moves occurring that were not as visible. It is recognized that replacements must occur to fill vacancies and individuals must be considered for career path moves. However, the concern is that such a large number of moves within a one to two month time frame can be disruptive to a relatively stable organization. It is the inspectors observation that the stations improved regulatory performance during 1982 was at least in part due to the stability of the station staff. In each case, the individuals selected shows the capability of conducting the job well. The concern is related to such a large number of people changing at one time and the following adjustment period, especially at the beginning of a major refueling outage. In some cases, it may take as much as a year or more for a person or the individuals affected to make such adjustments. In that time, the regulatory performance could decline to unacceptable levels primarily due to lack of familiarity. It is unreasonable to expect the staff to be in a freeze status, however, it seems changes should occur more gradually. Followup on this concern is an open inspection item. 10/83-05-02(DPRP), 237/83-05-02(DPRP), and 249/83-04-02(DPRP).

No item of noncompliance or deviation were identified in this area.

13. Allegations

The inspectors received allegations from an undisclosed source, related to improper practices with the personnel portal radiation monitors at the security gatehouse. The allegation indicated that when personnel leaving the station received an alarm indicating the presence of radioactive contamination on their person, they would continue on their way out of the gatehouse rather than return for a recount or survey by the radiation protection department. The allegation indicated that there was no one present to attempt to stop the persons with indication of contamination and that the occurrences were primarily contractor employees. No other specifics were provided.

The inspector observed security building activities at shift change on at least six occasions, of which two were at 6:15 p.m. and two were at 4:30 a.m. This provided an opportunity to observe licensee personnel as well as contractor personnel at shift change. During each occasion, several individuals showed evidence of contamination; however, in all cases, the individuals returned through the monitor successfully or returned to the Rad-Chem department for surveys and proper release in accordance with established procedures. In addition, on all occasions, a security guard was present to intercept the potentially contaminated persons.

The inspector recognizes that the newly installed portal monitors are extremely sensitive. This caused considerable controversy on site when their use was first implemented. Subsequently, the frequency of alarms has decreased as station personnel have become accustomed to them.

This matter has been discussed with a regional radiation specialist and it was agreed that the allegation should be considered closed. However, this will continue to be observed as part of the routine resident inspection program.

No items of noncompliance or deviations were identified in this area.

14. Meetings, Training and Off-site Activities

During this inspection period, the inspectors attended a resident inspectors two day seminar at the Region III office in Glen Ellyn, Illinois. One resident inspector attended a training session on the Freedom of Information Act and a Training session on Inspector Indoctrination.

15. Open Item

Open items are matters which have been discussed with the licensee, and which involves some action on the part of the NRC or licensee or both. An open item disclosed during the inspection is discussed in Paragraph 12.

16. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on February 2, 1983 and summarized the scope and findings of the inspection activities. The licensee acknowledged the findings of the inspection.