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Dresden Nuclear Power Station
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May 27, 1994

GFSLTR 94-0168

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Nuclear Power Station Unit 1
Response to NRC Inspection Report 94-01
NRC Docket No. 50-010

References: NRC Inspection Report 94-01, SPECIAL INSPECTION OF A POTENTIAL
LOSS OF WATER FROM THE DRESDEN UNIT 1 SPENT FUEL STORAGE POOL AND
OF THE PLANT'S COMPLIANCE TO THE SAFSTOR DECOMMISSIONING PLAN,
dated April 15, 1994

The Attachment to this letter provides the Dresden Station Unit 1 response to
NRC Inspection Report 94-01 items identified as requiring followup
inspections. This is in response to your request for a written description of
the actions we plan to take to address these issues. These actions have been
discussed with the NRC staff on several occasions.

To the best of my knowledge and belief the statements contained in this
document are true and correct. In some respects these statements are not
based on my personal knowledge, but on information furnished by other CECo
employees, contractor employees, and/or consultants. Such information has
been reviewed in accordance with company practice, and I believe it to be
reliable.

If you have any questions concerning this response, please contact C. Allen,
Unit 1 Licensing.

Sincerely,

Gary Spedl,
Station Manager
Dresden Station

GFS/CA:cfq

Attachment

cc: J. B. Martin, Regional Administrator - RIII
S. H. Weiss - NRR
P. B. Erickson, Dresden 1 Project Manager - NRR
C. D. Pederson, Region III
M. N. Leach, Senior Resident Inspector, Dresden
File/Numerical

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ATTACHMENT
NRC INSPECTION REPORT 50-10/94001
NRC INSPECTOR FOLLOW-UP ITEM SUMMARY

Inspector Follow-up Item 50-010/94001-02

"The permanent corrective actions to remove the siphon potential associated with the existing SFP and transfer pool piping will be reviewed..." (IFI No.50-010/94001-02 (DRSS))

Current Status: Dresden Station has addressed the potential for siphoning and drainage of the SFP and spent fuel transfer pool and has determined that there is no significant potential for lowering the water levels below the Technical Specification limit of 18 feet.

- 1) All hoses which run to the SFP and spent fuel transfer pool are installed in a manner such that they can not siphon or drain the SFP and transfer pool below the Technical Specification Limit of 18 feet.

- 2) Spent Fuel Pool Cooling and Filter System:

The spent fuel cooling and filter system lines have been isolated from the SFP by closing the valve closest to the pool and placing it out of service. A siphon break has been installed on the one line to the cooling and filter system which does not have an isolation valve. Permanent siphon breaks for this system to supplement the isolation valves have been designed and will be installed by October 31, 1994.

- 3) Contaminated Demineralizer System

The contaminated demineralizer system has two 4" lines which connect to the SFP and fuel transfer pool. The valves isolating the 4" lines from the SFP and fuel transfer pool are closed, and would only be operated when higher capacity make-up is needed. There is no significant siphon potential on the line to the fuel transfer pool because it terminates slightly below the surface of the pool.

The contaminated demineralizer system line to the SFP passes through the spent fuel transfer pool on a path which goes through a low elevation. This line, which also has an isolation valve installed, could siphon water only if the line were to break twice; once in the transfer pool, and once outside of it at a lower elevation with the isolation valve open. When the SFP gates are installed, that hypothetical siphon would only lower the level of the transfer pool. The probability of a double line break while the valve is open is extremely small and no other action is needed.

Inspector Follow-up Item 50-010/94001-03

"A new fuel pool filtration system... was being modified... to address siphoning concerns... The proposed changes were acceptable. Incorporation of these changes and the issuing of procedural controls to ensure surveillance of the pump cutoff switch will be reviewed during a future inspection." (IFI No.50-010/94001-03 (DRSS))

Current Status: The permanent fuel pool demineralizer system design is essentially complete and is expected to be finalized in early June. Some of the equipment has been received on site. The new design includes a low flow cutoff switch in the discharge line that shuts off the pump as was discussed during the inspection. Procedural controls to ensure calibration of the switch will be established after installation and testing of the system. Switch calibration will be maintained in the station surveillance data base(GSRV). This design will enable operation with the SFP gate installed between the SFP and the transfer pool and preclude any significant siphoning potential. The system is now scheduled to be operational by October 31, 1994.

Inspector Follow-up Item 50-010/94001-04

"Portions of piping in radwaste tunnel that were still in use had significant surface corrosion. The licensee's resolution of the corrosion problem will be reviewed..." (IFI No.50-010/94001-04 (DRSS))

Current Status: Work has not progressed on the resolution of the corrosion problem due to making the environment habitable. Correction of lighting deficiencies and decontaminating of the Rad Waste Tunnel is essentially complete. Surfaces are being sealed to fix contamination and groundwater seepage prevention measures are being performed. The piping for systems in service will be identified and the extent of corrosion will be determined. Any significant corrosion on portions of systems remaining active will be evaluated and the piping maintained as required.

Inspector Follow-up Item 50-010/94001-05

"The actions that the licensee takes to improve its environmental monitoring and water inventory programs will be reviewed..." (IFI No.50-010/94001-05 (DRSS))

Current Status: The Operating Department is recording both the fuel transfer pool and SFP levels and recording any water additions every shift in accordance with approved temporary changes to station procedures. Permanent operating procedures are currently being revised to collect this data and describe actions to take if an abnormal loss is identified. These procedure revisions will be in place by June 30, 1994.

The water level and addition data is collected on a routine basis and is being trended. A procedure for trending this data and describing actions to take after these trends are reviewed will also be in place by June 30, 1994.

The Unit 1 fuel pool low level alarm and fuel building Area Radiation Monitors (ARMS) are calibrated on an annual basis. Both of these surveillance/calibrations are procedurally controlled by the Station Surveillance System (GSRV).

Dresden Station has drilled and sampled groundwater monitoring wells in the immediate vicinity of the fuel storage building to assess potential migration of water out of the fuel pool. The water samples are being evaluated for the presence of tritium, which has been determined to be the best isotopic indicator which can be directly correlated to fuel pool water. The initial tritium sample results indicate low levels of communication between the fuel pool water and the immediate surroundings. This level of communication is not significant relative to allowable effluent limits, and is consistent with the close match between the makeup rate and the expected evaporation rate. This low level of communication is also consistent with the observed tight cracks in the pool walls and transfer tunnel, and supports the conclusion that there is no gross pool leakage.

The results of the initial phase of this program and the long term environmental program will be communicated to the NRC in a letter from D. L. Farrar to W. Russell by May 30, 1994.

Inspector Follow-up Item 50-010/94001-06

"Resolution of the gasket service life issue, implementation of the permanent procedure, and results of the examination of the section mating surfaces will be reviewed..." (IFI No.50-010/94001-06 (DRSS))

Current Status: New gate seals have been ordered via PO #4U 4048 dated 5/4/94. and delivery is expected before the end of August. A permanent procedure for removal and installation of the gates (DFP 0800-35) has been written and approved. (April 14, 1994) This procedure includes specific limitations regarding when the gates may be removed and requires that the seals be inspected upon gate removal and prior to gate replacement. An examination of the mating surfaces will be done upon installation of the new seals. Surface repairs will be done as necessary. Expected gasket lifetime will be determined by discussion with the manufacturer of the new seals.

Inspector Follow-up Item 50-010/94001-07

"...plans had been made to cut and cap several of the lines outside the containment...The licensee had not decided on a course of action on the remaining penetrations at the completion of the inspection. This matter will be reviewed..." (IFI No.50-010/94001-07 (DRSS))

Current Status: Completed cut and caps of systems which could break and cause significant water to be released into the sphere are complete as stated in the Inspection Report. The remaining systems have been walked down and are being evaluated. Unused portions of required systems are also being evaluated for cutting and capping. Engineering work is in progress to design cut and caps for high priority systems.

Inspector Follow-up Item 50-010/94001-08

"During a review of the licensee's Offsite Dose Calculation Manual (ODCM) the inspectors noted that...listed the exhaust flow rate of the fuel storage building into the Unit 1 stack as 5200 cfm instead of the actual flow of 2000 cfm. The licensee's revision of the ODCM to correct these values will be reviewed..." (IFI No.50-010/94001-08 (DRSS))

Current Status: The discrepancy in ODCM ventilation descriptions is being corrected and will be in the June 30, 1994 revision. The ODCM is changed routinely on an as needed basis.

Inspector Follow-up Item 50-010/94001-11

"The inspectors also reviewed the current status of 15 systems described ...as remaining operable during the SAFSTOR period. The final status of these systems will be reviewed during a future inspection "(IFI No.50-010/94001-11 (DRSS))

Current Status: The systems required for SAFSTOR are being evaluated and will be returned to service or the decommissioning plan will be modified as appropriate. Engineering evaluations are being performed on systems to ensure there are no safety concerns. Unused portions of the required systems are also being walked down and evaluated for possible cut and capping to minimize the amount of piping remaining in service.

Inspector Follow-up Item 50-010/94001-12

"The effectiveness of the fully-established organization will be reviewed in a future inspection." (IFI No.50-010/94001-12 (DRSS))

Current Status: The Unit 1 organization presently includes the Unit 1 Manager, with no collateral duties. Reporting to the Manager are a Technical Superintendent, a Licensing Director, a Director for planning and monitoring Unit 1 activities, and an Operating Engineer, dedicated exclusively to Unit 1. Reporting to the Technical Superintendent are two Unit 1 specific System Engineers and an ALARA Engineer. Other support personnel as required are assigned through normal station work control processes.

Inspector Follow-up Item 50-010/94001-13

"The licensee stated that it planned to reconfirm the quality verification expectations for Unit 1 with the cognizant auditor. Effectiveness of long-term actions to address Unit 1 quality verification weakness will be reviewed..." (IFI No.50-010/94001-13 (DRSS))

Current Status: Actions have been taken to include Unit 1 in Quality Verification programs as described in the enforcement conference package. To summarize: Site QV Oversight Role has been clarified and activities integrated into the Site Quality Verification programs on a Unit 1 specific basis as well as a functional basis. One site QV person has been assigned collateral duties to provide primary coverage of Unit 1 activities. The 1994 Audit Schedule has been revised to integrate Unit 1 activities into other scheduled audits. Commitments are in our tracking system to evaluate Unit 1 needs when developing the annual audit schedule. Team leaders will review applicability of Unit 1 activities for each of their audits. In addition the QA Topical Report is being revised to include a requirement for auditing the decommissioning plan.

Inspector Follow-up Item 50-010/94001-14

"SFP Water Cleanup System. ... The installation and operation of the new system will be reviewed..." (IFI No.50-010/94001-14 (DRSS))

Current Status: The temporary poolside system was made operational April 27, 1994 and has been maintaining SFP water chemistry within Technical Specification Limits. The permanent system is scheduled to begin installation by July, and be fully operational by October 31, 1994. NRC concerns about siphoning have been factored into the new system design which allows suction from both the SFP and transfer pool with the gates installed.

Inspector Follow-up Item 50-010/94001-15

"A follow-up inspection of the results of the licensee's efforts to clean up the loose contamination resulting from the spill will be tracked as an Inspection Follow-up Item..." (IFI No.50-010/94001-15 (DRSS))

Current Status: Decontamination is in progress including washing, mopping and hydrolyzing the lower elevations of the sphere. Expect to finish in June. Goal is to decontaminate to the extent that people have access to main areas of sphere without masks.