

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-10/83-07(DPRP); 50-237/83-09(DPRP); 50-249/83-08(DPRP);
50-254/83-09(DPRP); 50-265/83-09(DPRP); 50-295/83-05(DPRP);
50-304/83-05(DPRP); 50-373/82-06(DPRP); 50-374/83-09(DPRP);
50-454/83-11(DPRP); 50-455/83-09(DPRP); 50-456/83-04(DPRP);
50-457/83-04(DPRP)

Docket Nos. 50-10; 50-237; 50-249;
50-254; 50-265; 50-295;
50-304; 50-373; 50-374;
50-454; 50-455; 50-456;
50-457

License Nos. DPR-2; DPR-19; DPR-25;
DPR-29; DPR-30; DPR-39;
DPR-48; NPF-11; CPPR-100;
CPPR-130; CPPR-131; CPPR-132
CPPR-133

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

Facility Names: Dresden 1, 2, 3; Quad Cities 1, 2; Zion 1, 2; LaSalle 1, 2;
Byron 1, 2; and Braidwood 1, 2

Meeting Held At: U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Meeting Date: February 17, 1983

Prepared By: C. E. Norelius, Director
Division of Project and Resident Programs

C. E. Norelius

R. L. Spessard
R. L. Spessard, Director
Division of Engineering

3/15/83

Reviewed By: A. B. Davis
Deputy Regional Administrator

A. B. Davis

3/15/83

Meeting Summary

Meeting on February 17, 1983 (Reports No. 50-10/83-07(DPRP); 50-237/83-09(DPRP);
50-249/83-08(DPRP); 50-254/83-09(DPRP); 50-265/83-09(DPRP); 50-295/83-05(DPRP);
50-304/83-05(DPRP); 50-373/82-06(DPRP); 50-374/83-09(DPRP); 50-454/83-11(DPRP);
50-455/83-09(DPRP); 50-456/83-04(DPRP); 50-457/83-04(DPRP))

Region III staff views on root causes of past problems were discussed.
Suggestions were made for licensee consideration in improving regulatory
performance.

Results: No noncompliances resulted from the meeting.

DETAILS

1. Meeting Attendees

Commonwealth Edison Company

B. Thomas, Executive Vice President
C. Reed, Vice President - Nuclear
L. DelGeorge, Staff Assistant
D. Farrar, Director, Nuclear Licensing
J. Malley, Manager, Projects
W. Shewski, Manager, Quality Assurance

Nuclear Regulatory Commission (Region III)

C. E. Norelius, Director, Division of Project and Resident Programs
R. L. Spessard, Director, Division of Engineering

2. Meeting Purpose

There have been an increased number of events recently at Commonwealth Edison Company operating and construction sites which have lead to consideration or issuance of civil penalties. The purpose of the meeting was to look for root causes thereby leading to corrective actions.

3. Operating Sites

At the operating sites, some improvements in programs have been noted by the Region III staff. The health physics programs at Zion and Dresden were especially noted. However, other problems have been identified which have resulted in escalated actions. A recently proposed civil penalty resulted from the use of improper materials at both Quad Cities and Dresden. This demonstrated a problem in enforcing a clear directive from Engineering, and improper response to that directive by both sites. Another proposed civil penalty has been issued for operations problems at Dresden, and another matter is under consideration for a civil penalty (enforcement conference already held) at Quad Cities. No common root cause has been identified by the Region III staff for these particular events; however, examples from different NRC inspectors when viewed collectively, may indicate that Commonwealth Edison made decisions to keep reactors on line and took less conservative approaches than desirable. Examples given included maintenance activities which were scheduled or changed to allow more on line time and which resulted in reportable events, the approach to the repair of recently discovered pipe cracks at Dresden, and the reluctance to shut down the reactor according to the emergency procedures during the December flooding at Dresden.

Regarding the LaSalle plant, the NRC representatives expressed concern that the licensee's operating staff may become overstressed by operating Unit 1 while also conducting tests for getting Unit 2 on line. The Region III staff also expressed concern that the licensee did not always take prompt corrective actions when potential problems were brought to their attention. On the other hand, Commonwealth Edison representatives stated that on some recent occasions the NRC staff was demanding prompt

action on matters based on preliminary reports from other facilities before the information had been fully evaluated and translated into sound regulatory requirements.

4. Construction Sites

NRC representatives noted that the NRC has taken a stronger enforcement posture in the area of construction than a few years ago.

New approaches must be considered by the licensee to assure the adequacy of construction and to assure documentation of its quality. It was suggested that greater attention be focussed on assuring quality is built into the plants, and not let quality suffer at the expense of schedule believing that subsequent inspections will identify problems. Some examples were noted where construction activities were carried on without the benefit of QA procedures or inspections, and it appeared that scheduling had overriding considerations. Methods of providing both negative and positive feedback to construction workers from inspection findings were discussed.

The NRC representatives noted that the effectiveness of the licensee's QA program should be increased. It was observed that when NRC conducts an inspection and finds significant problems, questions arise as to why the licensee's QA program did not identify the situations. The NRC staff expressed the view that the QA staff at Commonwealth Edison had individuals of lesser experience than those in the construction program and, therefore, their ability to detect and analyze the significance of problems was not as great as it would be if more experienced people were in the QA program. Commonwealth Edison representatives disagreed and indicated that they felt their Quality Assurance people had an appropriate level of training and experience. Concern was also expressed by NRC representatives that audits may be too narrow and when findings are made, corrective action may be narrowly limited to the precise finding instead of broad applicability. The NRC representatives noted that QA should be more involved in the planning aspects so that construction personnel have a better understanding of the QA requirements.

It was suggested that the licensee may want to establish a high level panel, much as it did for operating reactor events a few years ago, and review construction events to determine root causes and take positive corrective actions.

5. Communications

The area of general communications was also addressed during the meeting. The NRC representatives noted that especially at construction sites, it appeared that communications between NRC inspectors and licensee representatives were strained. Some inspectors have expressed the view that licensee representatives respond very narrowly to questions, and do not always give sufficient information to satisfactorily answer questions, even when such information may be known. The licensee representatives stated that they also shared the concern that communications were strained

in some areas. From their perspective, they cited sources of communications problems as being threats of escalated enforcement during inspections, comments relating to lack of confidence in Commonwealth Edison's credibility, and experiences of investigations into allegations where multiple questions were asked with the reason for the questions not being given. No clear cut solutions were proposed. It was recognized that the NRC does have a need to obtain information and that the licensee should cooperate fully in providing it. It was also noted that NRC inspectors can not unilaterally impose escalated enforcement actions, and the licensee's staff should recognize that such matters will be communicated by NRC management.

6. Conclusion

The meeting identified several general areas for further licensee consideration in looking for ways to improve regulatory performance. No written response was requested of the licensee.

Mr. Reed stated that one way the NRC could be helpful in improving licensee performance would be to give positive feedback to the licensee on things that are going well. That would focus attention on these areas and encourage similar improvements in other areas.