



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUL 25 1983

Docket Nos.: 50-237  
50-249

RE HQ FILE COPY

Commonwealth Edison Company  
ATTENTION: Mr. Cordell Reed  
Vice President  
P. O. Box 767  
Chicago, IL 60690

Gentlemen:

Subject: Performance Appraisal Inspection 50-237/83-16, 50-249/83-15

This letter forwards the report of the Performance Appraisal Inspection conducted by Mr. D. G. Hinckley and members of the Operating Reactor Programs Branch, Office of Inspection and Enforcement, on May 9 - 20 and May 31 - June 3, 1983, of activities authorized by NRC Operating Licenses DPR-19 and DPR-25 for the Dresden Nuclear Station. This letter also refers to the observations presented to Mr. D. P. Galle, Division Vice President and General Manager, Nuclear Stations, and members of his staff on June 3, 1983, at the Dresden Nuclear Station.

The enclosed report includes observations that may result in enforcement actions; these matters will be followed by the NRC Regional Office. The report also addresses other observations and conclusions made by the inspection team for this inspection. Enclosure (1) to this letter is an Executive Summary of the conclusions drawn for the eight functional areas inspected.

As a result of the significant weaknesses identified in Onsite and Offsite Review and Investigative Functions and Plant Operations, designated as Category Three, you are requested to inform this office within 60 days of receipt of this letter of the actions you have taken or plan to take to improve the management controls in these areas. Your response will be followed by the NRC Regional Office.

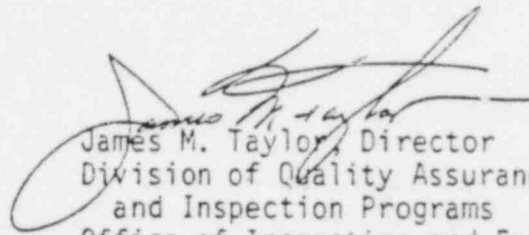
In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure(s) will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

8308290389 830725  
PDR ADOCK 05000237  
Q PDR

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



James M. Taylor, Director  
Division of Quality Assurance, Safeguards,  
and Inspection Programs  
Office of Inspection and Enforcement

Enclosures:

1. Executive Summary
2. IE Management Appraisal Report  
50-237/83-16 and 50-249/83-15

cc w/enclosures:

D. P. Galle, Division Vice President and  
General Manager Nuclear Stations  
D. J. Scott, Station Superintendent  
W. J. Shewski, Manager Quality Assurance  
E. P. Wilkinson, INPO

Distribution (w/Report):

SECY  
OPE  
OCA (3)  
W. J. Dircks, EDO  
H. R. Denton, NRR  
C. Heltemes, AEOD  
H. L. Thompson, NRR  
R. Gilbert, NRR  
H. Boulden, OIA  
NRC Sr. Resident Inspector, Dresden Nuclear Station  
R. C. DeYoung, IE  
J. H. Sniezek, IE  
J. M. Taylor, IE  
Region III Reading  
All Licensees  
State of Illinois  
PAT Regional Coordinators  
PAT Files  
IE Files  
PDR  
LPDR  
NSIC  
NTIS  
Project Division Directors, RI through RV

Distribution (w/o Report):

IE Reading

IE:DQASIP:ORPB  
JPKearney:tb  
7/15/83

IE:DQASIP:PAS  
JHineckey:  
7/15/83

IE:DQASIP:ORPB  
JGPartlew:  
7/15/83

IE:DQASIP:D  
JMTaylor:  
7/15/83

## EXECUTIVE SUMMARY

A team of six Inspection Specialists from the Operating Reactor Programs Branch conducted an announced inspection at the Dresden Nuclear Station and the Commonwealth Edison Company corporate offices during the period of May 9 through June 3, 1983. Management controls in eight areas were evaluated and assigned Performance Categories as follows: Quality Assurance Audits and Procurement were rated as Category One; Design Changes and Modifications, Maintenance, Corrective Action Systems, and Training were rated as Category Two; and Onsite and Offsite Review and Investigative Functions and Plant Operations were rated as Category Three.

The inspection team identified a number of weaknesses that are described in the enclosed inspection report. A summary of the significant strengths and weaknesses in the licensee's management controls are provided in the following compilation of the conclusions for each inspection area.

### Onsite and Offsite Review and Investigative Functions: Category Three

The Onsite and Offsite Review and Investigative Functions were conducted by a series of participants who individually reviewed the various documents routed to them. Weaknesses in the procedures for the Onsite and Offsite Review and Investigative Functions and weaknesses in the knowledge level of participants as to their review responsibilities were considered significant. In particular, the lack of understanding of the applicability of 10 CFR 50.59 and the lack of understanding of an unreviewed safety question were crucial weaknesses because of the "series" nature of the review process.

### Quality Assurance Audits: Category One

A weakness in this area was the failure of the Onsite and Offsite Review and Investigative Functions to review Quality Assurance (QA) audit reports or findings. Poor trending and minor problems in the performance of audits were other weaknesses.

The significant strengths included the assignment of a licensed Senior Reactor Operator (SRO) for the site audit staff; a comprehensive schedule of audits and surveillances; and effective reports to upper level management, including a proven method of escalating late responses or deficient corrective actions on audit findings.

Design Changes and Modifications:    Category Two

Several weaknesses were identified in the area of Design Changes and Modifications. These included the failure of modification packages to contain a listing of all affected drawings, procedures, and Field Change Requests (FCRs); the lack of sufficient written guidance provided to Quality Control (QC) and QA personnel for the establishment of hold points and review of completed modifications; the untimeliness of procedure revisions; the lack of an as-built critical drawing file; and the lack of adequate policy and guidance for control of jumpers and lifted leads.

Maintenance:    Category Two

Significant weaknesses included the lack of involvement of the Radiation Protection Group in the preplanning of maintenance activities; the failure to document evaluation of equipment failures for root causes; and the failure of management to enforce the use of an approved procedure.

A strength was the use of color-coded work packages for maintenance activities.

Plant Operations:    Category Three

Several significant weaknesses were identified in the area of Plant Operations. These included the number and method of implementing Station Procedure Temporary Change Requests; the inattentiveness of Nuclear Station Operators (NSOs) on shift; the lack of operator adherence to station policies and procedures; and the lack of specific guidance to ensure that the analysis of a plant protective trip was systematic, detailed, and complete before restarting the plant. One strength observed was the assignment of a Shift Engineer's Assistant to each operating crew.

Corrective Action Systems:    Category Two

The most significant weaknesses in this area included inadequate training for station personnel in Corrective Action Systems; the failure of Onsite or Offsite Review and Investigative Functions to review Discrepancy Records, Radiation Occurrence Reports (RORs), and trending reports of RORs; the failure to followup adequately on Discrepancy Record responses; and the lack of long term corrective action on RORs.

There were no significant strengths in this area; although the ROR trending reports appeared to be comprehensive documents.

Training: Category Two

Several significant weaknesses were identified in the area of Training. These included the lack of a training manual or other single document for uniformity of maintenance and operations training; the apparent failure to transfer lessons learned from classroom and on-the-job training (OJT) to the job site; no team training except for fire brigade drills; the lack of a written program to train operations and maintenance personnel on significant plant modifications and associated new or revised procedures; the lack of a written OJT program for mechanics; and no required training program for instrument mechanics. Strengths identified included the establishment of a four year B.S. degree program; the placing in service of the Production Training Center; and maintenance of a six-shift rotation, with one shift devoted full-time to training.

Procurement: Category One

Significant strengths included effective procedures, effective inventory control, comprehensive vendor evaluation and audit programs, and the use of NRC notices and other industry reports to improve procurement activities.

Weaknesses identified were warehouse storage practices and the control of motor shaft keys.