

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-237/87009(DRS); 50-249/87008(DRS)

Docket Nos. 50-237; 50-249

Licenses No. DPR-20; DPR-25

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Power Station, Units 2, and 3

Inspection At: Morris, Illinois

Inspection Conducted: February 23-26, 1987

Inspector: *F. J. Jablonski*
N. C. Choules

3-12-87

Date

Approved By: *F. J. Jablonski*
F. J. Jablonski, Chief
Quality Assurance Program Section

3-12-87

Date

Inspection Summary

Inspection on February 23-26, 1987 (Reports No. 50-237/87009(DRS);
50-249/87008(DRS))

Areas Inspected: Routine, announced inspection of the licensee's
action on previous inspection findings (92701 and 92702) and followup on
recommendations made in Inspection Reports No. 50-237/85008, 50-249/85007;
and 50-237/85038, 50-249/85038 (92701).

Results: No violations or deviations were identified. Of 21
inspection findings and recommendations reviewed, 20 were closed.

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DETAILS

1. Persons Contacted

- *J. Wujciga, Production Superintendent
- D. Booth, Master Instrument Mechanic
- B. Colebank, Maintenance Instructor
- *J. Hrusosky, QA Inspector
- M. Jeisy, Station QA Supervisor
- R. Meadows, Maintenance Staff Engineer
- L. Sebby, Master Electrical Mechanic
- M. Strait, Master Mechanical Mechanic
- *J. Williams, Staff Assistant, Regulatory Assurance
- *R. Zenter, Assistant Maintenance Superintendent

Other licensee personnel were contacted during the course of the inspection.

*Denotes those attending the exit interview on February 26, 1987.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Open Item (237/85008-02; 249/85007-02): Revision of Procedure DMP 2100-1, "Calibration of Micrometers," and deletion of inside diameter (ID) micrometers from the calibrated instrument list. The inspector verified that Procedure DMP 2100-1 was revised to delete requirements to calibrate ID micrometers, and the micrometers had been removed from the calibrated instrument list. The licensee no longer uses ID micrometers where calibrated measurements are required. This item is closed.
- b. (Closed) Unresolved Item (237/85007-05; 249/85007-05): Adequacy of training regarding the requirement that maintenance procedures be at the job site. The master electrical, mechanical and instrument mechanics indicated during interviews with the inspector that during tailgate meetings (group meetings) emphasis was placed on having maintenance procedures at the job site. A QC inspector indicated that procedures were usually at the job site. Resident inspectors normally observe this activity during tours of the plant. This item is closed.
- c. (Closed) Open Item (237/85032-01; 249/85028-01): Implementation of Procedure DAP-2-10, "Control of Vendor Equipment Technical Information." Procedure DAP-2-10 required that vendor technical manuals be reviewed, approved, and administratively controlled. Implementation of DAP-2-10 was approximately 65% completed. There were approximately 100 manuals left to be reviewed and approved. This activity was completed at the rate of about five per week. If a technical manual was not approved, but needed for a maintenance activity, DAP-2-10 required the manual to be reviewed for technical adequacy prior to use. Due to the length of the plant outage,

complete implementation of DAP-2-10 was delayed. Adequate controls were in place for review of technical manuals and the inspector has no further concerns about the implementation of DAP-2-10. This item is closed.

- d. (Closed) Open Item (237/85032-02; 249/85028-02): Tracking of recommended actions from vendor information documents was not implemented. The inspector determined from the review of completed printouts that the licensee tracked the recommendations from vendor information documents. This item is closed.
- e. (Closed) Violation (237/85032-03; 249/85028-03): Failure to document the review and approval of test results for surveillance Procedure DTS-300-2. The inspector verified that, as stated in the licensee response dated November 15, 1985, a change had been made to DTS-300-2 to require documentation of test results. Also, as stated in the response, a procedure change was made to DAP 9-3, "Procedure Review and Writing" that included a requirement for all surveillance or test results to be reviewed with reference to known acceptance criteria. This review, along with the acceptance criteria, was to be documented. The inspector reviewed three recently completed DTS-300-2 surveillance tests and verified that the test results and evaluations were documented. This item is closed.
- f. (Closed) Open Item (237/85040-01; 249/85038-01): Expansion of component failure trending program. The licensee's trending program was structured to identify trends based on individual component failures within specific plant systems. The licensee reviewed the program to determine if it could be expanded to identify failures of specific equipment types that were common to several plant systems. The licensee determined that the trending could not be expanded with the current computer software. All failures could be recalled on an individual basis from the maintenance history. The licensee plans to utilize this type recall in conjunction with failures identified on specific components by the trending program to identify possible generic component failures. This item is closed.
- g. (Closed) Open Item (237/85040-02; 249/85038-02): Results and recommendations of the semiannual review of work requests were not documented. The inspector determined that the electrical and mechanical departments documented the semiannual review; however, there wasn't any indication that recommendations had been made. The instrument department documented the review and recommendations each time a computer printout was received that had three failures on a piece of equipment. The licensee was in the process of changing the review program and its documentation. A new procedure had been drafted to control the review of maintenance requests and equipment failures. The above item is considered closed; however, the licensee's revised program will be reviewed during a future inspection (237/87009-01; 249/87008-01).

- h. (Closed) Unresolved Item (237/85038-03; 249/85040-03): Several preventive maintenance (PM) and surveillance activities appeared to be past due. The licensee determined that these activities were not required by technical specification and appeared to be past due because the computer tracking system was the same as the one used for technical specification required activities. The licensee changed the tracking system for non-technical specification activities; the current status of those activities was provided. The inspector reviewed the current status of non-technical specification PMs and surveillances. The inspectors determined that the PMs and surveillances had been generally performed as specified. For items that were overdue, a monthly report was prepared and the responsible department notified. A review of Licensee Event Reports (LERs), during the time the unresolved item was identified, indicated that there were no overdue technical specifications required surveillances. This item is closed.
- i. (Open) Unresolved Item 249/86003-01: Piping vendor non conformance reports to be evaluated for 10 CFR Part 21 reportability. Documentation of these evaluations was not available at the plant site and Station Nuclear Engineering had difficulty retrieving the information at the corporate office. This item remains open.
- j. (Closed) Open Item (237/86005-01; 249/86008-01): An evaluation of the Document Control Program about drawing controls was not completed. The licensee completed the evaluation, made procedure changes, and conducted audits of control room drawings. The licensee improved methods for updating control room drawings. Drawing indexes were reviewed and revised as necessary. Some drawings were enhanced by redrawing a single drawing onto two or more sheets. This item is closed.

3. Maintenance Assessment Followup

During March and April 1985, a special, in-depth review and evaluation of maintenance activities at the Dresden Plant was performed. As documented in Inspection Report No. 50-237/85008; 50-249/85007 seven recommendations were made by NRC. A followup inspection was performed in December 1985. As documented in Inspection Report No. 50-237/85040; 50-245/85038 four recommendations were made by NRC. The licensee responded to the four recommendations in a letter dated March 11, 1986. During this inspection, the inspector reviewed the status of these eleven NRC recommendations. Information was obtained by the inspector through interviews, attendance at a tailgate meeting, and reviews of records and procedures. Results are as follows:

- a. (Closed) Recommendation (237/85007-J06; 249/85008-J06): Ability of QC Department to adequately support maintenance during peak periods. This item was included in Unresolved Item 237/85008-04; 249/85007-04 and closed out in Inspection Report No. 50-237/85040; 50-249/85038; therefore, this recommendation is closed.

- b. (Closed) Recommendation (237/85008-J07; 240/85007-J07): The reduction of maintenance personnel errors should continue to be given management attention. Interviews by the inspector indicated that management was committed to the reduction of personnel errors. Personnel have been disciplined for personnel errors. The Dresden Station Weekly Report tracks personnel errors and provides management with pertinent information. This recommendation is closed.
- c. (Closed) Recommendation (237/85008-J08; 249/85007-J08 and 237/85040-J05; 249/85038-J05): Reduction of work request backlog. In the licensee's March 11, 1986, response to this item, a backlog goal of less than 1100 corrective work requests was set. This goal was not achieved. During 1986, the backlog was reduced to approximately 1200 on two occasions; however, the backlog increased because of extended outages for Units 2 and 3. At the time of this inspection, the backlog of work requests was approximately 1800. The resident inspectors continually track the work request backlog. This recommendation will no longer be tracked by region based inspectors. This recommendation is closed.
- d. (Closed) Recommendation (237/85008-J09; 249/85007-J09): Management should be fully supportive of both QA and QC. QA and QC personnel indicated in interviews with the inspector that there was increased management support for QA and QC activities and increased cooperation with crafts personnel. This recommendation is closed.
- e. (Closed) Recommendation (237/85008-J10; 249/85008-J10): Management should reemphasize that crafts persons must be accountable for work and personnel errors. Interviews with all levels of maintenance management by the inspector indicated that crafts person accountability was emphasized. So far this year, no maintenance personnel errors were committed compared to eight during the last six months of 1986. There was a downward trend in personnel errors caused by maintenance crafts persons. This recommendation is closed.
- f. (Closed) Recommendation (237/85008-J11; 249/85007-J11): Licensee Production Training Center should consider separating the nuclear specific instruction program from fossil fuel related instruction. Basic non-nuclear training, which is applicable to both nuclear and fossil plants, was still given to nuclear and fossil personnel in the same classroom. The Training Center now provides some nuclear specific training to nuclear personnel. The Dresden Maintenance Training Program, which was accredited by INPO in January 1987, provides most of the nuclear specific training at the Dresden Plant. Interviews with the master mechanics by the inspector indicated there was continuous training of maintenance personnel with up to 20% of the time devoted to training. This recommendation is closed.

- g. (Closed) Recommendation (237/85008-J12; 249/85007-J12): Management's selection and supervisory training of first line supervisors should be done with utmost care. Interviews with management by the inspector indicated that management was well aware of the need to select and train supervisors with care to improve first line supervision. The licensee established a task force to review supervisory training programs for possible improvement. This recommendation is closed.
- h. (Closed) Recommendation (85040-J04; 85038-J04): Expedite implementation of an effective maintenance history and trending program. As indicated by the licensee's March 11, 1986, response, most plant components were entered in the computer data base for the maintenance history and trending program. The licensee indicated that work requests for the past three years were included in the computer history. All current work requests were entered when initiated and completed. The trending program was not completely implemented. As indicated in Paragraph 2.g, a new procedure for the review of trending information would be written. The recommendation is closed.
- i. (Closed) Recommendation (85040-J06; 85038-J06): Evaluate the scope and effectiveness of the PM program. As indicated in the licensee's March 11, 1986, response, the licensee evaluated the PM program and agreed that changes were needed to provide a more effective program. Procedure DAP-4.2, "Preventive Maintenance Program," was revised to reflect an approach to preventive rather than corrective maintenance. The licensee established and filled the position of PM coordinator. The licensee reviewed the PM program and made appropriate adjustments and additions which will continue as an ongoing program. This recommendation is closed.
- j. (Closed) Recommendation (85040-J09; 85038-J09): Provide better information about indicators and trends of plant reliability and operation that would benefit management personnel in oversight responsibilities. The licensee's March 11, 1986, response to this item described several steps that had been taken to aid management in oversight responsibilities. Although not specifically discussed in the response, the licensee initiated a Dresden Station Weekly Report. This report included information and trends about reactor scrams, personnel errors, deviation reports (DVRs), licensee event reports (LERs), and personnel contamination. It appeared to the inspector to be an effective report to keep all levels of management informed of reliability and other plant problems. This recommendation is closed.

Licensee management involvement was evident and acceptable progress was made with all 11 recommendations. All recommendations were closed in this report; however, continued licensee management involvement is necessary to maintain acceptable performance in the area of maintenance, including in particular, the backlog of work requests.

4. Open Items

Open items are matters that have been discussed with the licensee, which will be reviewed further by the inspector, and involves some action on the part of NRC, the licensee, or both. An open item identified during the inspection is described in Paragraph 2.g.

5. Exit Meeting

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection and summarized the purpose, scope, and results. The inspector also discussed the likely content of this inspection report with regard to documents or processes reviewed by the inspectors. The licensee did not identify any such documents or processes as proprietary.