



Commonwealth Edison

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May 17, 1989

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Response to the SALP 8 Board Report
NRC Docket Nos. 50-237 and 50-249

References (a): Letter from A.B. Davis to Cordell Reed
dated April 4, 1989, transmitting SALP 8
Board Report No. 50-237/89001; 50-249/89001

(b): Cordell Reed letter to Victor Stello, Jr.,
"Commonwealth Edison's Response to US NRC
Diagnostic Evaluation", dated January 22, 1988

Dear Mr. Davis:

Reference (a) transmitted the SALP 8 Board Report for Dresden Station and summarized our performance ratings for the period of February 1, 1988 through January 31, 1989. The purpose of this letter is to provide Commonwealth Edison's comments, as also requested in Reference (a).

We believe that the SALP 8 Board Report represents a balanced assessment from a regulatory perspective of our strengths, improvements, and problems encountered during the report period. As discussed during the SALP meeting on May 8, 1989, we were especially pleased with the Category 1 rating in Plant Operations which we recognize as a key functional area and one of the most difficult in which to achieve and maintain excellence. Also gratifying was the acknowledgement in this evaluation of the substantial improvements in the Maintenance area, which have become more evident during the SALP 8 period.

CECo concurs with the SALP Board's conclusion that obvious progress has been made in these and other areas at Dresden as a result of our extensive improvement efforts, which have been integrated and focused through the use of the Dresden Station Improvement Plan (DSIP). This plan was developed following

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the August, 1987 NRC Diagnostic Evaluation of Dresden and was implemented per Reference (b) near the start of the SALP 8 period. CECo believes that another key factor has been the improved teamwork and attitude of the Dresden Staff together with strong leadership from the station management.

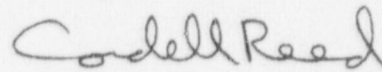
Mr. Greenman's summary remarks at the SALP meeting noted the overall improvement and extensive management involvement during the SALP period. Of particular note was the positive performance, exhibited consistently in all seven functional areas, with respect to responsiveness to NRC initiatives. The depth of CECo's commitment to the Dresden improvement effort was also evidenced by the large number (16) of Self-Assessments (SA) conducted during the period with associated short and long term corrective actions. We also appreciate the point that Mr. DuPont made concerning SA efforts, i.e., they are only considered a strength if they are effective and contribute to real improvement as has been the case at Dresden.

Although CECo agrees that this was a good SALP and we are proud of the Station's progress, we also realize that further improvement is needed and that maintaining a high level of performance is also essential in areas where significant gains have already been realized. As indicated at the meeting by Messrs. Eenigenburg and Thomas, this positive NRC feedback will ~~not~~ result in complacency but instead provides additional motivation for Dresden and the corporate support team.

Please note that several items of clarification, some of which were discussed by Joe Eenigenburg at the meeting, are included in the Attachments. Although CECo understands that these points may not affect the overall SALP ratings, we would appreciate the opportunity to clarify them with the appropriate Region and/or NRR Staff personnel.

Please direct any comments you may have regarding this response to the Nuclear Licensing Department.

Very truly yours,



Cordell Reed
Senior Vice President

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Attachments (2)

cc: B.L. Siegel - Project Manager, NRR
S.G. DuPont - Senior Resident Inspector, Dresden

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ATTACHMENT A

DRESDEN SALP 8

ITEMS OF CLARIFICATION

A. Electrochemical Potential (ECP) Monitoring

During the demonstration phase of hydrogen addition in Unit 2, an ECP monitor was installed as part of the Electric Power Research Institute (EPRI) project. This ECP monitoring system was designed for laboratory application and was adapted for use as part of the project. The research and development type ECP monitor was not intended for long-term use, but to establish operating parameters for hydrogen addition. The Station did not maintain it after the demonstration phase of the project, relying rather on hydrogen addition rates found to be adequate during the demonstration phase.

As Hydrogen Water Chemistry technology has developed, ECP monitors have also been developed to provide an effective ongoing verification that the proper quantity of hydrogen is added to reactor coolant water. Last year the Station decided to install such a "production grade" ECP monitor to more effectively verify our hydrogen addition rates. With the identification of additional crack indications in certain D2 piping systems during the recent refueling outage, the implementation schedule was accelerated. We now anticipate having the system operable during the third quarter of 1989 rather than the 18 month schedule referred to in the SALP report.

B. Reportability of Security Events

Commonwealth Edison (CECo) has had ongoing discussions with the Region III staff on issues regarding reportability and logability of security events at our nuclear facilities. This was being tracked as Unresolved Item 50-454/88004-03; 50-455/88005-03 at Byron Station. This item was recently closed in Inspection Report 50-454/89008 (DRSS); 50-455/89011 (DRSS) with the following statement:

After discussions with the Nuclear Security Administrator and site security staff, it was agreed that the licensee would report to the NRC, within one hour after occurrence, all events identified as reportable in Appendix E and Section 5.7 of CNSG No. 1.

The Dresden Station Security Program now implements all aspects of the above agreement. CECo is, however, prepared to discuss this concern further with your staff should any additional assurance or clarification be needed.

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C. Disposition of Slightly Contaminated Soil

There are approximately 60,000 cubic feet of slightly contaminated soil currently collected in a grass covered mound east of the Unit 1 Chemical Cleaning Building. The proposed disposal site is located just north of the Unit 2/3 intake canal, outside the security fence, but within the owner controlled area. As recommended by the generic guidance in USNRC IE Notice Nos. 83-05 "Obtaining Approval for Disposing of Very Low Level Radioactive Waste 10 CFR Section 20.302" and 86-90 "Request to Dispose of Very Low Level Radioactive Waste Pursuant to 10 CFR 20.302", CECO has taken the following actions to dispose of the soil:

1. In June, 1987, Illinois became an Agreement State. Once Illinois became an agreement state, the Illinois Department of Nuclear Safety (IDNS) assumed responsibility under Title 32 Illinois Administrative Code, Chapter II, Section 340.3020(a) for approving requests for alternate (onsite) disposal. An application for the slightly contaminated soil was submitted to IDNS on January 21, 1988.
2. Responses to subsequent IDNS questions on the application were transmitted to IDNS on February 14, 1989.
3. A draft rule which proposes to reassert NRC authority over onsite disposal has been issued. Comments were solicited and the comment period on this draft rule has terminated. If the NRC reasserts its authority over such approvals, then CECO will pursue disposal approval with the NRC under provisions of the 10 CFR 20.302(a).
4. A meeting of the Central Midwest Compact has been scheduled for mid-July to discuss alternate (onsite) disposal applications within the compact borders.
5. This topic will also be discussed with your staff as part of a meeting previously scheduled by D.L. Farrar for May 26, 1989.

In addition to the relocation of the above soil, Dresden also has plans for in-place disposal of soil around the radwaste discharge lines which became slightly contaminated as described below.

Dresden Station identified a leak in the radwaste discharge line in October, 1984. As a result, the existing radwaste discharge line was capped and a new discharge line was installed. Problems were later encountered in the new line which resulted in some additional leakage. The leaks in the new line were subsequently repaired. These leaks, in both the old and the new line, have resulted in the detection of very low levels of radioactive contamination in the soil surrounding the radwaste discharge lines. The following actions have been taken or are in progress:

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1. In an effort to determine the extent of the contamination, soil samples from the area surrounding the radwaste discharge lines were collected and analyzed using the Station's radiochemistry laboratory. The initial analysis, however, was not adequate for the purpose of performing this type of environmental dose assessment study.
2. For this reason, a comprehensive sampling and analysis plan was initiated. General Physics has prepared a draft plan which is being modified to reflect CECo comments. This plan calls for the re-sampling and analysis to be completed early in the fourth calendar quarter of 1989.
3. CECo will provide a 340.3020(a) [or 10 CFR 20.302(a)] submittal requesting approval to leave the material in-place, once the enhanced sampling/analysis program is complete.

D. Utilization and Oversight of Engineering Contractors

To effectively manage the design engineering aspects of twelve operating reactors, CECo believes that reliance on outside engineering organizations is both necessary and acceptable with proper oversight by experienced in-house personnel. The SALP 8 report, however, implies essentially total dependence on consultants without any technical oversight. CECo does not believe this to be a fair characterization of our engineering program.

As indicated in an attachment to our response to the Quad Cities SALP 7 Report, CECo has previously initiated a number of steps to assure effective oversight of AE's and the technical quality of the work they perform. This description is enclosed here as well (Attachment B).

While it is true that CECo relies heavily on consultant expertise for most design activities, this reliance is not exclusive. It should be noted that CECo has been independent of the NSSS/nuclear fuel supplier with respect to PWR reload core design and associated neutronics licensing analyses since the early 1980's, with reload designs in support of sixteen (16) cycles complete or in progress. Similar efforts are underway for BWR reload design and plant transient analyses.

Although reload design and licensing is an area which has proved to be cost-effective to internalize, this approach cannot be taken in many other engineering areas without extensive additional resources. It is our intent, however, to critically evaluate our engineering program over the next year to determine other areas where additional expertise can and should be developed within CECo.

CECo would appreciate an opportunity to discuss this concern further with you, your staff and appropriate NRR representatives. A meeting has been scheduled by M.J. Wallace for June 23, 1989 (9:00 a.m.) at the CECo Offices in Downers Grove, IL (Opus III Building). This and other subjects concerning our engineering and construction program will be addressed.

ATTACHMENT B

BWR ENGINEERING PERFORMANCE IMPROVEMENTS

EXISTING AND RECENTLY IMPLEMENTED

- Corporate Engineering - Permanent site staff assigned to improve engineering support and overview of site technical and construction activities
- A.E. Surveillance Program - Evaluation of AE performance on specific modifications by a CECO engineering team and as appropriate third party technical experts.
- AE Annual Performance Evaluation - Formal program/procedure to evaluate AE performance, provide feedback to AE management and report to CECO management.

(Note: INPO good practice)

- AE Guidebook & Updates (Note: INPO good practice)

The AE Guidebook is the general engineering work specification for nuclear plant engineering. It has been in place for several years, and is formally updated semi-annually and updated by memorandum more frequently. For example, following is a list of a few of the improvements added in 1988.

Revisions to the AE Guidebook dated February 22, 1988

1. Instructions to AE's to use Nuclear Plant & Reliability Data System NPRDS database when preparing specifications in Project Plan II or Detail Design Phase.
2. Instruction to AE's to obtain the latest revision of Vendor Manuals when assembling Design Input Requirements (DIR) for a modification,
3. Instruction to AE's to use INPO SER/SOER Index when preparing Project Plan
4. Clarification on where to obtain drawings and drawing numbers
5. Revised cable routing instructions
6. Addition of section on Embedment Plate Attachments

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7. Revised Standard Quality Assurance Articles for Regulatory Related Areas of Fire Protection, Security, Meteorology and Environmental Monitoring

Revisions Dated October 28, 1988

1. Addition of an acknowledgement of the Electrical Installation Standard (EIS)
 2. Addition of new Appendix A - Procedure for Tracking Electrical Load Changes using ELMS
 3. Revision to Architect Engineers Workscope Checklist
 4. Addition to Engineering Practice and Design Criteria - Requiring AE's to perform the necessary review to identify all applicable FSAR design basis requirements.
 5. Addition on a LaSalle specific note on Project Documentation Turnover
 6. The addition of the Item E.53, "Original Approval Date" shall remain on Drawing at all times, to the Drawing Standards
 7. Addition of revised Standard Quality Articles for the Regulatory Related Areas of Fire Protection, Security, Meteorology and Environmental Monitoring
- Field Change Request (FCR) - Trending and feedback to AE's
 - Increased emphasis on design inputs and as-built configuration.
 - CECO approval of design inputs
 - Modification program walkdowns (Designer & Installer)
 - Engineering Assurance Program
 - Established organization in BWRE in 1988
 - Full implementation in 1989
 - Design Basis Documentation Consolidation by system pilot documents for HPCI - 1988
 - Safety System Functional Testing Program - Dresden Diesel Generator
 - Piping Analysis Data System (PADS) - Standard, Controlled Data Base for safety related piping system analyses

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Planned Improvements

- Routine FCR Trending and Feedback by BWRE - site engineering staff
- On a sampling basis, expert technical reviews of Architect/Engineering Firms (EA's)
- Engineering Assurance Program
Full implementation and focus on identifying areas with technical quality weaknesses and correcting these identified weaknesses.

The following will be utilized to identify areas of potential technical quality weakness

FCR Trending Reports
QA Audit Reports
QA Surveillance Reports
Station Feedback
NRC Inspection Reports

- Design Basis Documentation
Initiate Full Implementation - 5-10 Systems in 1989
- Pending Revision to the modification approval procedure (Q.6) to streamline administrative and further enhance technical quality