

September 7, 2000

Mr. Oliver D. Kingsley  
President, Nuclear Generation Group  
Commonwealth Edison Company  
ATTN: Regulatory Services  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: DRESDEN INSPECTION REPORT 50-237/011(DRP); 50-249/011(DRP)

Dear Mr. Kingsley:

On August 10, 2000, the NRC completed an inspection at Dresden Units 2 and 3. The enclosed report presents the results of that inspection. The NRC discussed the results on August 10, 2000, with Mr. M. Pacilio and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC identified two issues that were determined to be of very low safety significance (Green). The first issue involved inadvertent painting of temperature sensors used in the Dresden Emergency Operating Procedures. The second issue was related to the failure to perform a flood barrier surveillance test. These issues have been entered into your corrective action program, and are discussed in the summary of findings and in the body of the enclosed inspection report. Additionally, the enclosed inspection report also discusses issues in two Licensee Event Reports that were violations of NRC requirements. One violation was for inadequate historical testing of the 250 VDC battery system, and the other violation involved inadequate inspections of piping snubbers. Each issue was evaluated under the significance determination process and was determined to be of very low safety significance (Green). These violations are being treated as non-cited violations (NCVs), consistent with Section VI.A.1 of the Enforcement Policy. The NCVs are described in the subject inspection report. If you contest these non-cited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington, D.C. 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Dresden Nuclear Power Facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available **electronically** for public inspection in the NRC Public Document

Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

Mark Ring, Chief  
Reactor Projects Branch 1

Docket Nos. 50-237; 50-249  
License Nos. DPR-19; DPR-25

Enclosure: Inspection Report 50-237/2000011(DRP);  
50-249/2000011(DRP)

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249  
License Nos: DPR-19; DPR-25

Report No: 50-237/200011(DRP); 50-249/200011(DRP)

Licensee: Commonwealth Edison Company

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: 6500 North Dresden Road  
Morris, IL 60450

Dates: June 28 through August 10, 2000

Inspectors: D. Smith, Senior Resident Inspector  
B. Dickson, Resident Inspector  
D. Roth, Resident Inspector  
R. Zuffa, Illinois Department of Nuclear Safety

Approved by: Mark Ring, Chief  
Reactor Projects Branch 1  
Division of Reactor Projects

## NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

<b>Reactor Safety</b>	<b>Radiation Safety</b>	<b>Safeguards</b>
<ul style="list-style-type: none"><li>● Initiating Events</li><li>● Mitigating Systems</li><li>● Barrier Integrity</li><li>● Emergency Preparedness</li></ul>	<ul style="list-style-type: none"><li>● Occupational</li><li>● Public</li></ul>	<ul style="list-style-type: none"><li>● Physical Protection</li></ul>

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

## SUMMARY OF FINDINGS

IR 05000237-00-011, IR 05000249-00-011; on 6/28 - 8/10/2000; Commonwealth Edison Company; Dresden Nuclear Power Plant; Units 2 and 3. Equipment Alignment, Flood Protection Measures, Other Activities.

The inspection was conducted by resident inspectors. This inspection identified four green issues, two of which were non-cited violations. The significance of issues is indicated by their color (green, white, yellow, red) and was determined by the Significance Determination Process.

### Mitigating Systems

- GREEN. The inspectors noted that the area temperature sensors used in Dresden Emergency Operating Procedure (EOP) 0300-01, "Secondary Containment Control" Revision 6, were inadvertently painted. The paint could delay entry into the EOP by preventing the sensors from properly sensing area temperature.

Through a Significance Determination Process Phase 1 screening, the inspectors concluded that the painted sensors did not result in the actual loss of any mitigating systems, and therefore the issue was of very low safety significance. (Section 1R04)

- GREEN. The inspectors, and independently the licensee, noted that Dresden Technical Surveillance Procedure 0020-04, "Operating Flood Barrier Surveillance," Revision 6, had not been completed even though the procedure was supposed to be performed once every refueling cycle. The inspectors also noted that maximum safe water level placards in the reactor building were missing. The placards were used in Dresden Emergency Operating Procedure 0300-01, "Secondary Containment Control."

Through a Significance Determination Process Phase 1 screening, the inspectors concluded that the findings did not involve the degradation of equipment designed to mitigate a flooding initiating event or the loss of any safety function that contributed to external event-initiated core damage accident sequences. The findings were of very low safety significance. (Section 1R06)

### Event Follow-Up

- GREEN. The licensee submitted Licensee Event Report (LER) 237/1998-013-00 because historical testing of 250 vdc systems did not meet Technical Specification surveillance requirements due to a design error in establishing the worst case battery load profile. This violation is being treated as a non-cited violation (NCV), consistent with Section VI.A.1, of the NRC Enforcement Policy (**NCV 50-237/2000-011-01(DRP)**).

The inspectors used the Significance Determination Process analysis to determine the safety significance of the event, and concluded that the finding did not represent an actual loss of safety function. The event was of very low safety significance. (Section 4OA3)

- GREEN. The licensee submitted Licensee Event Report 50-237/2000-003-00 because the licensee failed to comply with Technical Specifications due to the untimely submittal of an American Society of Mechanical Engineers code relief request. This violation is being treated as a NCV, consistent with Section VI.A.1, of the NRC Enforcement Policy **(NCV 50-237/2000-011-02(DRP))**.

The inspectors used the Significance Determination Process analysis to determine the safety significance of the event, and concluded that the finding did not represent an actual loss of safety function. The event was of very low safety significance. (Section 40A3)

## Report Details

### Summary of Plant Status

Unit 2 began this period at full power. On July 7, 2000, Unit 2 experienced a transient downpower due to the 2B reactor recirculation pump tripping because of a trip of the recirculation pump motor oil pump.. Load was reduced to about 240 MWe. The tripped pump was restarted and full power was restored by July 8, 2000.

Unit 3 began this period at full power. On July 22, 2000, Unit 3 was temporarily reduced in power by about 15 percent in response to a valve problem during a planned evolution to reverse circulating water flow.

#### 1. **REACTOR SAFETY**

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

##### 1R01 Adverse Weather (71111.01)

###### a. Inspection Scope

On July 10, 2000, the inspectors assessed the licensee's implementation of adverse weather procedures in response to heavy rain and flood conditions. The assessment included review of Dresden Operating Abnormal procedure (DOA) 0010-04, "Floods," Revision 11, for harsh weather conditions that occurred between July 9 and 10, 2000.

###### b. Issues and Findings

There were no findings identified.

##### 1R04 Equipment Alignment (71111.04)

###### a. Inspection Scope

The inspectors selected a redundant or backup system (listed below) to an out-of-service or degraded train, reviewed documents to determine correct system lineup, and verified critical portions of the system configuration. Instrumentation valve configurations and appropriate meter indications were also observed. Operational status of support systems was verified by direct observation of various parameters. Control room switch positions for the systems were observed. Other conditions such as adequacy of housekeeping, the absence of ignition sources, and proper labeling, were also evaluated.

###### Mitigating System Cornerstone:

Unit 2 Isolation Condenser System  
Unit 2 Standby Liquid Control System

Unit 3 Containment Cooling Service Water System  
Unit 3 125 VDC Battery Charger System

Initiating Events Cornerstone:

Unit 2 Turbine Building Closed Cooling Water

b. Issues and Findings

The inspectors noted that the licensee painted the area temperature sensors in various locations on Unit 3. The paint may insulate the sensors, and thus delay any required entry into Dresden Emergency Operating Procedure (DEOP) 0300-01, "Secondary Containment Control," Revision 6, based on area temperatures being above normal. The licensee declared the sensors inoperable and took the actions required in the Dresden Administrative Technical Requirements. The licensee also initiated an operability evaluation and commenced removing the paint. This issue was documented in Condition Report #D2000-04287.

The inspectors used the Significance Determination Process (SDP) analysis to determine the safety significance of the degraded temperature sensors. Through a SDP Phase 1 screening, the inspectors concluded that the painted sensors did not result in the actual loss of any mitigating systems, and therefore the event was of very low safety significance, GREEN.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors toured the facility to determine the availability of fire detection and suppression systems and to identify fire impairment for the following areas.

Mitigating System Cornerstone:

Unit 2/3 Emergency Diesel Generator Room  
Unit 2 Isolation Condenser Makeup Pump Buildings  
Unit 3 Isolation Condenser Makeup Pump Buildings

The inspectors assessed the material condition, operational lineup, and operational effectiveness of active and passive fire protection systems and features. Documents reviewed included the Dresden Administrative Technical Requirements (DATR) No. 3/4.1, "Fire Protection," and DATR No. 3/4.2, "Post Fire Safe Shutdown." The inspectors also assessed the compensatory measures required due to the failures of the fire detection "XL3" device and the Unit 3 main transformer deluge system.

b. Issues and Findings

There were no findings identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors reviewed the Updated Final Safety Analysis Report and related flood analysis documents to identify those areas that can be affected by internal or external flooding, including water intake facilities. The inspectors also reviewed the risk studies to understand which plant areas contained risk-significant systems or components that were below internal or external flood levels or otherwise susceptible to flooding.

The inspectors reviewed the following documents:

DTS 0020-04, Revision 1, "Operating Flood Barrier Surveillance"  
DOA 0010-04, Revision 11, "Floods"  
Operability Evaluation 98-008 regarding flooding  
Condition Report # D2000-04346 regarding the self-assessment of flood protection  
The vendor's manual for the Emergency Diesel Generator Cooling Water Pumps

The inspectors also reviewed the correspondence from 1982 and 1983 regarding the results of the NRC's Systematic Evaluation Program review of flooding at Dresden.

b. Issues and Findings

The inspectors, and independently the licensee, noted that Dresden Technical Surveillance (DTS) Procedure 0020-04, "Operating Flood Barrier Surveillance," had not been completed. The procedure was intended to inspect internal flood barriers for degradation and defects, and the procedure stated that all flood barriers were to be inspected at least once every refueling cycle. The procedure had existed since at least May of 1995, but had not been performed. The inspectors and the licensee identified no requirements or commitments (other than the commitment in the procedure itself) to perform the procedure. The licensee entered the issue into the station's corrective actions process via Condition Report #D2000-04346.

The licensee was required to perform additional steps in DEOP 0300-01, "Secondary Containment Control," if water levels in the reactor building corner rooms exceeded the maximum safe water level values. The inspectors noted that maximum safe water level placards for DEOP 0300-01 were missing from the corner rooms. The licensee documented this problem in Condition Report #D2000-04402.

The licensee's self-assessment identified that the flood protection program needed to be treated as a program and ownership assigned to an engineering group and an individual. The licensee's self-assessment also identified the failure to perform the surveillance, but failed to identify the missing placards.

The inspectors used the Significance Determination Process to determine the safety significance of the licensee's failure to perform the Dresden Technical Surveillance and the missing placards. Through a Significance Determination Process Phase 1 screening, the inspectors concluded that the findings did not involve the degradation of equipment designed to mitigate a flooding initiating event, and the findings did not involve the loss of any safety function that contributed to external event-initiated core damage accident sequences. The findings were of very low safety significance, GREEN.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors observed the operating crew's performance during an emergency drill on August 2, 2000. The inspectors assessed licensed operator performance for crew Number 2, Team "C," and the evaluators' critiques. The inspectors also compared simulator board configurations with actual control room board configuration for consistency, especially with recent modifications implemented in the control room.

b. Issues and Findings

There were no findings identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors independently verified the implementation of the maintenance rule by verifying that systems were properly scoped within the maintenance rule. The inspectors also assessed the licensee's characterization of the failed structures, systems, and components. The inspectors verified that issues were identified at an appropriate threshold and entered into the corrective action program. The inspectors reviewed the licensee's implementation of the maintenance rule requirements for the following systems.

Mitigating System Cornerstone:

Unit 3 Low Pressure Coolant Injection System  
Unit 2 High Pressure Coolant Injection System  
Unit 2/3 Instrument Air

b. Issues and Findings

There were no findings identified.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors evaluated the effectiveness of the risk assessments performed before maintenance activities were conducted on structures, systems, and components and verified how the licensee managed the risk. The inspectors also verified that, upon identification of an unforeseen situation, the licensee had taken the necessary steps to plan and control the resulting emergent work activities. The inspectors also verified that the licensee adequately identified and resolved maintenance risk assessments and emergent work problems.

Documents reviewed included WC-AA-103, Revision 2, "On-Line Maintenance," and WC-AA-104, Revision 2, "Review and Screening for High Production Risk Activities and Work Authorization."

Mitigating Systems Cornerstone:

- \* The inoperability of the Unit 2 high pressure coolant injection cooler with the Unit 3 125 vdc battery charger out of service - Condition Report No. D2000-03640.
- \* Single Loop Operations on July 7, 2000.
- \* Unit 3 East low pressure coolant injection room sump piping plugged - WR# 990168546.
- \* Replace drain valve on fire valve 2-4121-500 - WR# 990146935.
- \* Clean/bridge/inspect and megger 3C containment cooling service water pump motor - WR# 990019467.
- \* 3A 125 vdc battery charger overhaul - WR# 990131541.

Initializing Event Cornerstone:

- \* Local leak rate test on low pressure coolant injection primary containment valve (3-1501-27) following discovery of leak on June 16, 2000.
- \* Troubleshooting and repair of a failed essential service system uninterruptable power supply inverter July 18-20, 2000.
- \* Unit 3 thermography on anticipated transient without scram breaker, June 26, 2000.
- \* Planned work on the Unit 2 125 VDC battery charger on July 31, 2000.

b. Issues and Findings

There were no findings identified.

1R14 Personnel Performance During Non-routine Plant Evolutions (71111.14)

a. Inspection Scope

On July 7, 2000, the inspectors reviewed the on-shift operating crew's performance during the non-routine single loop operations on Unit 2. The review included compliance

with the Dresden Operating Abnormal Procedure (DOA) 0202-01, "Recirculation (Recirc) Pump Trip - One or Both Pumps," Revision 16, and the Dresden General Procedure (DGP) 3-3, "Single Recirculation Loop Operation," Revision 16.

b. Issues and Findings

There were no findings identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the below listed operability evaluations to ensure that operability was properly justified and the component or system remained available, such that no unrecognized increase in risk had occurred.

Mitigating System Cornerstone:

- \* 00-032 regarding the high pressure coolant injection system motor speed changer

Initiating Event Cornerstone:

- \* 98-008 regarding flooding

b. Issues and Findings

There were no findings identified.

1R19 Post Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed and/or observed the following post maintenance tests.

Mitigating Systems Cornerstone:

- \* Torquing of the Packing Gland for Feedwater Regulating Valve on July 20, 2000.

Barrier Integrity Cornerstone:

- \* Unit 2 and 3 "A" Standby Gas Treatment System on May 16, 2000.
- \* Unit 2 Drywell Temperature Recorder Replacement on July 18, 2000.

b. Issues and Findings

There were no findings identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed surveillance testing on risk-significant equipment. The inspectors verified that the selected plant equipment could perform intended safety functions and satisfied the requirements contained in Technical Specifications (TS), the Updated Final Safety Analysis Report, and licensee procedures. The inspectors verified the test data sheets were complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the tests, the inspectors verified that the test equipment was removed, and that the equipment was properly restored to standby conditions.

The review included the following surveillance testing activities:

Barrier Integrity Cornerstone:

- \* Drywell Airlock Local Leak Rate Test, Dresden Technical Surveillance 1600-04, Work Request 990078478-01

Mitigating System Cornerstone:

- \* 3A and 3B Core Spray System Pump Test with Torus Available - Dresden Operating Surveillance (DOS) 1400-05, Work Request 990173176
- \* Unit 2 Diesel Generator Operability - DOS 6600-1, WR# 990189531
- \* Unit 2 Quarterly Diesel Generator Cooling Water Pump Test for Operational Readiness and In-service Test (IST) Program - DOS 6600-08, WR# 990173849
- \* Unit 2 Operator Oil Sampling for Offsite Laboratory Analysis - DOS 0040-02, WR# 990189534

b. Issues and Findings

There were no findings identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors screened active temporary modifications on systems ranked high in risk and verified that temporary modifications had not affected the safety functions of important safety systems. The review included the temporary alterations present on July 24, 2000.

b. Observations and Findings

There were no findings identified.

## 2. **EMERGENCY PREPAREDNESS [EP]**

### 1EP6 Drill Evaluation (71114.06)

#### a. Inspection Scope

The inspectors observed the August 2, 2000, Dresden Station 2000 Generating Stations Emergency Plan Integrated Drill preparation, execution, and critique. The inspectors observed the drill evolution and looked for weaknesses and deficiencies in classification, notification and protective action recommendation development. The inspectors compared identified weaknesses and deficiencies against licensee-identified findings to determine whether the licensee was properly identifying failures. The inspectors determined whether licensee assessment of performance was in accordance with the applicable criteria of Nuclear Energy Institute 99-02.

The scenario included a tornado on the site, an injury to a contaminated worker, a fuel leak, a breach of the isolation condenser, and a radiation release.

Documents reviewed included the exercise controller information, the Dresden Emergency Operating Procedures, and portions of the Emergency Plan Implementing Procedures.

#### b. Issues and Findings

There were no findings identified.

## 4. **OTHER ACTIVITIES**

### 4OA3 Event Follow-up (71153)

- .1 (Closed) LER 237/1998-013-00: Historical Testing of 250 Vdc Systems Did Not Meet Technical Specification Surveillance Requirements Due to a Design Error in Establishing the Worst Case Battery Load Profile. This issue was previously discussed in Section E4.1 of Inspection Report 97013, and was tracked as Unresolved Item 50-237/249/97013-06(DRP). The unresolved item was closed in Inspection Report 98021 when, after being questioned by the inspectors, the licensee concluded that a licensee event report (LER) was required; final closure of the issue was to be based on the LER. Review of the LER revealed no new issues. However, as reported in the LER, on August 25, 1998, it was determined that past 250 VDC battery service tests did not meet the surveillance requirement of TS 4.9.A.3 (previous TS)/4.9.C.4 (current TS). This violation is being treated as a non-cited violation (NCV), consistent with Section VI.A.1, of the NRC Enforcement Policy **(NCV 50-237/200-0011-01(DRP))**. The inspectors used the SDP analysis to determine the safety significance of the event, and concluded that the finding did not represent an actual loss of safety function. The event was of very low safety significance, GREEN. This LER is closed.
- .2 (Closed) LER 50-237/2000-002-00: Failure to Recognize That the Condition of the Degraded ASME Section XI Class Piping/weld Required Entry into TS 3.6.N Due to

Lack of Understanding of the TS Bases. This issue was discussed in Inspection Report 50-237/2000007(DRP); 50-249/2000007(DRP), and non-cited violation 50-237/2000-007-01 was identified for the issue. The LER revealed no new information. This LER is closed.

- .3 (Closed) LER 50-237/1998-001-01: Update to Post-LOCA Temperature in the Secondary Containment Higher Than Values Used for the Environmental Qualification of Electrical Equipment Due to Original Design Error. The NRC had met with the licensee on this topic in early 1998. The LER revealed no new information. This LER is closed.
- .4 (Closed) LER 50-237/2000-003-00: Technical Specification Non-compliance due to Untimely Submittal of an ASME Code Relief Request. As reported in the LER, the licensee was not inspecting snubbers in accordance with the requirements of TS 4.0.E. This violation is being treated as a non-cited violation (NCV), consistent with Section VI.A.1, of the NRC Enforcement Policy (**NCV 50-237/2000-011-02(DRP)**). The NRC subsequently granted the licensee's request for ASME code relief. The inspectors used the SDP analysis to determine the safety significance of the issue, and concluded that the finding did not represent an actual loss of safety function. The event was of very low safety significance, GREEN. This LER is closed.

#### 4OA5 Other

##### Temporary Instruction (2515/144)

###### a. Inspection Scope

The inspectors reviewed the performance indicator data collecting and reporting process using Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review," to determine if the licensee was appropriately implementing the NRC/Industry guidance. The inspectors reviewed the following documents:

RS-AA-122, Revision 2	"Regulatory Assurance Performance Indicator Monthly Review Process,"
RS-AA-123, Revision 1	"Performance Indicator Data Discrepancy and Issue Resolution,"
RS-AA-122-103, Revision 2	"Performance Indicator - Safety System Functional Failures,"
RS-AA-122-104, Revision 2	"Performance Indicator - Safety System Unavailability (HPSI/HPCI, RHR, AFW/RCIC, EDG),"
RS-AA-122-111, Revision 2	"Performance Indicator - Unplanned Power Changes per 7000 Critical Hours,"

The inspectors compared the licensee's policies with the licensee's practices, and the inspectors reviewed the completed data sheets from April through June of 2000, for the safety system function failure, safety system unavailability, and unplanned power changes performance indicators. The inspectors also reviewed the licensee's corrective actions process for related issues.

b. Issues and Findings

The procedures and policies were in accordance with the NRC and industry guidance. However, the licensee documented that the policies were not being followed consistently. For example, the data sheets for system unavailability were not being given to the appropriate personnel in a timely manner. As a result, some data had to be extracted from the operating logs instead of read from data sheets. The licensee documented this, and other areas for improvement, in Condition Report #D2000-04240, and assigned corrective actions to improve data collection.

4OA6 Management Meetings

The inspectors presented the inspection results to Mr. M. Pacilio and other members of licensee management at the conclusion of the inspection on August 10, 2000. The licensee acknowledged the findings presented. No proprietary information was identified.

## PARTIAL LIST OF PERSONS CONTACTED

### Licensee

M. Pacilio, Operations Manager  
D. Amber, Regulatory Assurance manager  
P. Boyle, Chemistry Manager  
R. Peak, Design Engineering Manager  
B. Stoffels, Maintenance Manager  
L. Licata, Engineering Administration Supervisor  
R. Whalen, System Engineering Manger  
B. Norris, Rad Protection  
H. Oclon, Nuclear Oversight  
D. Schavey, Operations  
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B. Scott, Operations  
R. Kelly, NRC Coordinator  
S. Butterfield, NRC Coordinator

### NRC

D. Roth, Dresden Resident Inspector  
B. Dickson, Dresden Resident Inspector  
M. Ring, Branch Chief  
D. Smith, Dresden Senior Resident Inspector

### IDNS

R. Zuffa, Illinois Department of Nuclear Safety

## ITEMS OPENED, CLOSED, AND DISCUSSED

### Opened

- 50-237/2000-011-01 NCV Historical Testing of 250 Vdc Systems Did Not Meet Technical Specification Surveillance Requirements Due to a Design Error in Establishing the Worst Case Battery Load Profile
- 50-237/2000-011-02 NCV Technical Specification Non-compliance due to Untimely Submittal of an ASME Code Relief Request

### Closed

- 50-237/1998-013-00 LER Historical Testing of 250 Vdc Systems Did Not Meet Technical Specification Surveillance Requirements Due to a Design Error in Establishing the Worst Case Battery Load Profile
- 50-237/2000-002-00 LER Failure to Recognize That the Condition of the Degraded ASME Section XI Class Piping/weld Required Entry into TS 3.6.N Due to Lack of Understanding of the TS Bases
- 50-237/1998-001-01 LER Update to Post-LOCA Temperature in the Secondary Containment Higher Than Values Used for the Environmental Qualification of Electrical Equipment Due to Original Design Error
- 50-237/2000-003-00 LER Technical Specification Non-compliance due to Untimely Submittal of an ASME Code Relief Request
- 50-237/2000-011-01 NCV Historical Testing of 250 Vdc Systems Did Not Meet Technical Specification Surveillance Requirements Due to a Design Error in Establishing the Worst Case Battery Load Profile
- 50-237/2000-011-02 NCV Technical Specification Non-compliance due to Untimely Submittal of an ASME Code Relief Request

### Discussed

- 50-010;50-237;249/97013-06 URI 250 VDC Battery Loading
- 50-237/2000-007-01 NCV Failure to follow operability evaluation procedure

## LIST OF BASELINE INSPECTIONS PERFORMED

The following inspectable-area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

Inspection Procedure		Report Section
<u>Number</u>	<u>Title</u>	<u>Section</u>
71111-01	Adverse Weather Preparations	1R01
71111-04	Equipment Alignment	1R04
71111-05	Fire Protection	1R05
71111-06	Flood Protection Measures	1R06
71111-11	Licensed Operator Requalification	1R11
71111-12	Maintenance Rule Implementation	1R12
71111-13	Maintenance Work Prioritization & Control	1R13
71111-14	Nonroutine Evolutions	1R14
71111-15	Operability Evaluations	1R15
71111-19	Post Maintenance Testing	1R19
71111-22	Surveillance Testing	1R22
71111-23	Temporary Plant Modifications	1R23
71114-06	Drill Evaluation	1EP6
71153	Event Follow-up	4OA3
TI	Performance Indicator Data Collecting and Reporting Process	4OA5
2515/144	Review	
(none)	Management Meetings	4OA6

## LIST OF ACRONYMS AND INITIALISMS USED

DATR	Dresden Administrative Technical Requirements
DEOP	Dresden Emergency Operating Procedure
DOA	Dresden Operating Abnormal
DTS	Dresden Technical Surveillance
IDNS	Illinois Department of Nuclear Safety
LER	Licensee Event Report
NCV	Non-Cited Violation
TS	Technical Specifications
URI	unresolved item
VIO	violation