



Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

July 3, 1979

Mr. James G. Keppler, Director  
Directorate of Inspection and  
Enforcement - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

SUBJECT: Dresden Station Units 2 and 3  
Response to IE Inspection Report  
Nos. 50-237/79-13 and 50-249/79-11.  
NRC Docket Nos. 50-237 and 50-249

REFERENCE (a): June 13, 1979 letter from R. F. Heishman to  
Byron Lee, Jr. transmitting IE Inspection  
Report Nos. 50-237/79-13 and 50-249/79-11

Dear Mr. Keppler:

Reference (a) contained the results of an inspection by  
Messrs. R. D. Walker and J. L. Barker of your office on May 2 - 18,  
1979 of activities at Dresden Station Units 2 and 3. During this  
inspection, certain activities appeared to be in noncompliance with  
NRC requirements. Commonwealth Edison Company's response to the  
item of noncompliance is contained in Attachment A to this letter.

Please address any additional questions that you might  
have concerning this matter to this office.

Very truly yours,

Cordell Reed  
Assistant Vice-President

Attachment

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ATTACHMENT AInfraction

Technical Specification 6.2.A.1. requires that detailed written procedures, including applicable checklists covering normal startup, operation, and shutdown of the reactor and other systems and components involving nuclear safety of the facility, shall be prepared, approved and adhered to.

10CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Commonwealth Edison Company Quality Assurance Manual Quality Requirement 5.0, paragraph 5.1 states "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists." Quality Procedure 5-51 of the same manual states "Checkoff lists are included for complex operations and documentation. These lists delineated in detail the steps an operator must follow in order to complete an operation."

Contrary to the above, the applicable valve/breaker/switch alignment procedures for the High Pressure Coolant Injection System, the Core Spray System and the Emergency Core Cooling Keepfill System contain numerous discrepancies with respect to the lineups stipulated in current Piping and Instrumentation Drawings (P & ID's). The discrepancies included: valves omitted, valves misaligned, and misnamed or unnamed valves, breakers and switches.

Corrective Action Taken and Results Achieved

The valve and breaker/switch alignment checklists which were considered inadequate are used after an extended shutdown period to provide directions for returning all the valves in the systems to their desired position prior to operation. Actual valve positions were verified during the inspection to be correct such that the valves could fulfill their intended function. Commonwealth Edison agrees, however, that the checklists should be consistent with the Piping and Instrumentation Drawings (P & ID's) and has initiated a priority program to review each of these checklists against the P & ID's and to make corrections as necessary to both documents.

## ATTACHMENT A

Corrective Action Taken and Results Achieved (Cont'd)

In addition, the actual position of all important valves and breakers/switches in these systems is checked much more frequently by other procedures. For example, DOP 040-5 currently requires a daily check of important manual and motor operated valve positions, pump status, and diesel generator alignment necessary for automatic operation of all ECCS systems, the Isolation Condenser, and the Standby Liquid Control System. Other procedures are used to ensure that these systems are returned to operable conditions after maintenance activities through tests and surveillances.

Corrective Action to be Taken to Avoid Further Noncompliance

As previously indicated, Commonwealth Edison has initiated a priority program to compare each of the ECCS systems mechanical and electrical checklists with the appropriate Piping and Instrumentation Drawing and to initiate corrections, if necessary, to both documents. This program will include a field verification of the valve and breaker numbers of accessible components, the identification tags attached to them and, where applicable, any locking devices which might be attached. Numbers will be assigned to those instrument stop valves which are currently unnumbered. Since the checklists reflect valve and breaker alignments while shutdown and the P & ID's show positions during normal operation, some differences should and will continue to exist between them, but these differences will be reviewed to ensure that they properly reflect the desired position information.

Date of Full Compliance

The reviews will be completed by August 1, 1979, for accessible equipment, and the applicable procedure changes and/or drawing change requests will be prepared and approved by September 1, 1979. The reviews of inaccessible equipment will be completed and the necessary procedure changes implemented prior to startup following the next refueling of each unit.