

DCD/DCB

February 4, 1997

EA 96-532

Mr. J. S. Perry  
Site Vice President  
Dresden Station  
Commonwealth Edison Company  
6500 North Dresden Road  
Morris, IL 60450

SUBJECT: NRC RESIDENT INSPECTION REPORT 50-010:237:249/96014(DRP) AND  
NOTICE OF VIOLATION

Dear Mr. Perry:

This refers to the inspection conducted on October 21 through December 6, 1996, at the Dresden Nuclear facility. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. During this period, routine resident inspections were performed. Based on the inspectors' findings, overall performance at the Dresden facility was safe. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Based on the results of this inspection, one apparent violation was identified and is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. The apparent violation involved the failure to perform post-modification testing of control room emergency ventilation system to ensure design requirements were maintained. This licensee identified issue, described in Section E2.1 of the enclosed report, is of concern because design modification testing controls were inadequate to ensure system operability was maintained. In addition, your engineering backlog reviews conducted in the spring of 1996 failed to identify the potential for significant system degradation due to the open control room modification packages. As a result, the control room was found not capable of maintaining the required positive pressure or in-leakage limitations. The as-found degradation was significant in that the potential may have existed for control room radiological doses to be in excess of regulatory limits following a design basis accident.

The circumstances surrounding the apparent violation, the significance of the issue, and corrective actions were discussed with members of your staff at the exit meeting on December 19, 1996. An open pre-decisional enforcement conference to discuss these apparent violations has been scheduled for February 28, 1997, at 10:00 a.m. (CST) in the Region III Office in Lisle, Illinois. The decision to hold a pre-decisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that

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enforcement action will be taken. This conference is being held to obtain information such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues, and the need for lasting and effective corrective action to enable the NRC to make an informed enforcement decision.

During the enforcement conference we expect you to address: (1) the circumstances resulting in the apparent violation; (2) your methods to ensure post-modification testing is completed in a timely manner; (3) the corrective steps that have been taken and the results achieved; (4) the corrective steps that will be taken to avoid further violations; and (5) the date when full compliance will be achieved. These discussions should not be limited solely to the control room heating, ventilation, and air conditioning (HVAC) system.

In addition, this is an opportunity for you to point out any errors in our inspection reports and for you to provide any additional information concerning your perspectives on: (1) the severity of the violations, (2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and (3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

In accordance with the Enforcement Policy, no Notices of Violation are presently being issued for these inspection findings. Please be advised that the number and characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violation is required at this time.

In addition to the concerns described above, an additional violation of NRC requirements was identified this period. The violation involves a failure to ensure that vendor technical information is controlled in accordance with your approved station procedures. This issue is of concern, because during previous inspections, the vendor equipment technical information program (VETIP) was a major topic, and the need for strong controls was clearly necessary to reduce your existing backlog. The emergency diesel generator (EDG) manual, which had information missing, was one of the manuals that had been processed through VETIP and was believed to be complete and correct. Our inspection identified this was not the case.

The violation is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violation is described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. Your response should include a discussion of your efforts to ensure that the VETIP procedures are being followed by your staff. Additionally, describe your efforts to ensure that all previously revised and approved manuals are complete and correct. The NRC will use your response, in

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part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room (PDR).

Sincerely,

/s/ J. A. Grobe for

James L. Caldwell, Director  
Division of Reactor Projects

Docket Nos. 50-10; 50-237; 50-249

Enclosures:

1. Notice of Violation
2. Inspection Report 50-010;237;249/96014(DRP)

cc w/encl: T. J. Maiman, Senior Vice President Nuclear Operations Division  
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