

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Dresden Nuclear Power Station Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 2 3 7										PAGE (3) 1 OF 0 2																																	
TITLE (4) Failure to Functionally Test Unit 2/3 Radwaste Tank Farm Level Instrumentation																																																					
EVENT DATE (5)									LER NUMBER (6)									REPORT DATE (7)									OTHER FACILITIES INVOLVED (8)																										
MONTH			DAY			YEAR			YEAR			SEQUENTIAL NUMBER			REVISION NUMBER			MONTH			DAY			YEAR			FACILITY NAMES												DOCKET NUMBER(S)														
																											Dresden Unit 3												0 5 0 0 0 2 4 9														
1 0			2 8			8 5			8 5			0 3			9			0 0			1 1			2 6			8 5															0 5 0 0 0											
OPERATING MODE (9) N										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)																																											
POWER LEVEL (10) 0 0 1 0										20.402(b)										20.405(c)										50.73(a)(2)(iv)										73.71(b)													
										20.405(a)(1)(i)										50.38(e)(1)										50.73(a)(2)(v)										73.71(c)													
										20.405(a)(1)(ii)										50.38(e)(2)										50.73(a)(2)(vi)										OTHER (Specify in Abstract below and in Text, NRC Form 366A)													
										20.405(a)(1)(iii)										X 50.73(a)(2)(i)										50.73(a)(2)(vii)(A)																							
										20.405(a)(1)(iv)										50.73(a)(2)(ii)										50.73(a)(2)(viii)(B)																							
20.405(a)(1)(v)										50.73(a)(2)(iii)										50.73(a)(2)(ix)																																	
LICENSEE CONTACT FOR THIS LER (12)																																																					
NAME Tim Wojtulewicz, Ext. 529															TELEPHONE NUMBER AREA CODE 8 1 5 9 4 2 1 - 1 2 9 1 2 1 0																																						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																					
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPROS		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPROS		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPROS																									
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SUPPLEMENTAL REPORT EXPECTED (14)																																																					
YES (If yes, complete EXPECTED SUBMISSION DATE)															NO															EXPECTED SUBMISSION DATE (15)										MONTH DAY YEAR													
															X																																						

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

While performing a procedure review, the Instrument Maintenance Department determined that a quarterly functional test of the 2/3 radwaste tank farm level instrumentation had not been performed by the 6-17-85 due date. This was in violation of the Technical Specifications Table 4.2.2. The required functional test was a recent addition to the Technical Specification that had become effective on 3-15-85. An initial surveillance had been performed on 3-17-85.

The functional test had not been performed by the required due date because the surveillance procedure for the test had not been approved before the next scheduled surveillance period. As a result, the surveillance had not been included into the computerized surveillance tracking system and the functional test went past due. New transmitters were installed and calibrated on 8-27-85 and the next functional test was performed on 9-13-85. As a corrective action, a change will be made to the appropriate administrative procedures to include new Technical Specification related surveillances on the computerized tracking system before the surveillance is approved. The event was of minimal safety significance since the total above ground storage tank activity was always below the Technical Specification limit of 3 Curies. This is a first event of this type at Dresden Station.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

TEXT (If more space is required, use additional NRC Form 366A's) (17)

On 10-28-85 at 1445 hours, while performing a procedure review, the Instrument Maintenance Department determined that a 2/3 radwaste tank farm level instrumentation functional test (DIS 2000-2) had not been performed during the second surveillance interval (6-17-85 due date). This event was contrary to Technical Specification Table 4.2.2 which requires that functional tests be performed on radwaste tanks once per 92 days. The required functional test was a recent addition to the Technical Specifications and was implemented on 3-15-85. The first functional test was completed on 3-17-85. Surveillance DIS 2000-2 was written to perform future surveillances with the intent of being on-site reviewed and added to the computerized station surveillance schedule before the second surveillance interval (6-17-85).

In the Dresden Procedures Program, DAP 9-2, Procedures Preparation, all new surveillances which are required to be performed on a scheduled basis, must be submitted with a Form 11-2A (Surveillance File Control, Request for Surveillance File Change). Technical Specification related surveillances are monitored on a computerized station surveillance schedule. Presently, new surveillances are added to the schedule after approval and completion of the on-site review of the new procedure.

In this incident, the procedures package for DIS 2000-2, which included Form 11-2A, was inadvertently misplaced by the Instrument Mechanics (IM) Department during its routing. The procedures package was originally submitted to the Procedures Coordinator on 3-27-85. After normal processing and typing, it was returned to the Instrument Maintenance Department for originator proofreading on 4-3-85. The Procedures Coordinator notified the department several times (once per month for approximately 5 months) that the procedure had not been returned, and it was during this period of time that the surveillance became past due. During this period, new level transmitters were installed on the tank farm and calibrated on 8-27-85. During a check regarding the scheduled dates of functional tests required by the Technical Specifications, the Instrument Maintenance Department discovered that DIS 2000-2 had not been included in the schedule. The procedure was located and sent to the Procedures Coordinator on 9-4-85. The level instrumentation was then re-calibrated on 9-13-85. Due to the fact that the scheduled due date of the functional test preceded the on-site review date of the procedure, it was not performed during the second surveillance interval.

To prevent recurrence of this incident, DAP 9-2 will be revised for new Technical Specification related surveillances and revised Technical Specification related surveillances. Upon initial review of a procedure by the Technical Staff Supervisor, Form 11-2A will be sent directly to the Procedures Coordinator before the procedure is approved. Appropriate actions will be taken concerning the procedure if the surveillance becomes due before the procedure is approved.

This event was of minimal safety significance since the total above ground storage tank activity was always below the Technical Specification limit of 3 Curies. This is a first event of this type at Dresden Station.



Commonwealth Edison

Dresden Nuclear Power Station

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November 26, 1985

DJS LTR: #85-1119

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Document Control Desk
Washington, D.C. 20555

Licensee Event Report #85-039-0, Docket #050237 is being submitted as required by Technical Specification 6.6 , NUREG 1022 and 10 CFR 50.73(a)(2)(i)(B).

fr D. J. Scott
Station Manager
Dresden Nuclear Power Station

DJS/rme

Enclosure

cc: J. G. Keppler, Regional Administrator, Region III
File/NRC
File/Numerical

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