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Dresden Generating Station  
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DCS/SCB

**ComEd**

December 30, 1996

JSPLTR 96-0251

Mr. A. Bill Beach  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4351

Subject: Confirmatory Action Letter Action Item Update  
Docket Nos. 50-010, 50-237, and 50-249

Reference: NRC Confirmatory Action Letter RIII-96-016, A. Bill Beach to  
J. S. Perry dated November 1996

Dear Mr. Beach:

The purpose of this letter is to provide the monthly update of activities identified in your Confirmatory Action Letter (CAL) (Reference).

The first monthly meeting to provide the status of activities to the NRC was conducted on December 19, 1996 at Dresden Station. At this meeting the status of the CAL action items, Special Site Quality Verification (SQV) Audits, and the progress of the twelve system key parameter screening and the Dresden Engineering Assurance Group (DEAG) were discussed.

**Dresden Engineering Assurance Group Activities**

The DEAG was formed on November 11, 1996 with four full-time members and three part-time members. To date the group has reviewed issues identified by the Independent Safety Inspection relating to the Low Pressure Coolant Injection/Containment Cooling Service Water System, the High Pressure Coolant Injection System, and the 125/250 volt direct current batteries. Additionally, the DEAG has also reviewed the Operability Determination performed for the Control Room, the 3B recirculation motor movement, inspection, and testing, the feedwater logic change, and certain setpoint changes.

Based on the above reviews the DEAG observed that Engineers do not validate design inputs. However, several engineering products reviewed by DEAG required corrections to strengthen design input assumptions or evaluate secondary effects and system interactions. To date, there have been no major deficiencies noted in the engineering products reviewed. Additionally, SQV performed an independent review of the DEAG documentation for the reviews performed and agreed with the above conclusions.

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### Twelve Risk Significant Key Parameter Screening Status

The 12 systems most important from a risk perspective for the Dresden Station are as follows:

- Safety Related 125/250 VDC
- 4 kV/480 VAC Distribution (excluding diesel generators)
- Low Pressure Coolant Injection (LPCI)
- Automatic Depressurization System (ADS)
- Containment Cooling Service Water (CCSW)
- Isolation Condenser (including makeup water)
- Feedwater/Condensate
- Turbine Building Closed Cooling Water (TBCCW)
- Main Steam Safety and Relief Valves
- Service Water
- High Pressure Coolant Injection (HPCI)
- Emergency Core Cooling System (ECCS) Initiation Logic

A matrix identifying preliminary key system parameters for the 12 systems has been developed. A team for validating the system key parameters has been formed. This team consists of senior non-ComEd and ComEd engineers. ComEd is working to complete the system key parameter screening by February 28, 1996.

### Special Audits of Architect/Engineers and Vendors.

In December 1996 an special audit of design control issues at Sargent & Lundy was completed. The audit of Sargent & Lundy (S&L) identified six findings and six recommendations as well as one finding for ComEd Corporate Engineering, and one recommendation for ComEd Nuclear Oversight. The findings relating to Sargent & Lundy were:

- instances of failure to promptly identify and correct a non-conforming condition
- calculations contained inappropriate, unverified, incorrect assumptions, and design inputs
- the independent review process failed to identify some concerns noted in an audit
- internal audits were programmatic in nature and failed to identify certain design control problems
- completed calculations were not always distributed or microfilmed
- Quality Assurance control concerns for piping analysis program

The recommendations were:

- S&L should clarify and provide additional detail to support the October 30, 1996 safety significance position on the Containment Cooling Service Water/Low Pressure Coolant Injection (CCSW/LPCI) hydraulic calculations.
- S&L should develop a governing procedure and flowchart for the corrective actions program elemental interrelationships
- S&L needs to define Nuclear Engineering Procedures (NEP) and Equipment Qualification (EQ) relationships in their procedures.
- S&L should provide procedural guidance for performance of third party reviews.
- S&L should document on Calculation Cover Letters the affect on other calculations and documents.
- S&L needs to perform a formal review of files when utilizing computer calculation fields.

The ComEd Corporate Engineering finding was:

- Safety related design activities of its architect engineer (Sargent and Lundy) were not properly controlled.

The ComEd Nuclear Oversight expectations and audit findings were:

- ComEd expects that its vendors will adhere to their ComEd approved Q.A. Program and meet the intent of NQA-1 and 10 CFR 50 Appendix B as they apply to their activities. This is expected to include a technical review as well as a programmatic review of their activities during their internal audits and self assessments.
- On Nov. 12-19, 1996 Nuclear Oversight performed an audit of S&L (audit # AE 96-i7) and identified several areas of concern, all of which have been discussed with Region III of the NRC. All of the issues found during the audit are documented on Corrective Action Records (CARs) and require a written response from S&L to the Audit Team Leader no later than January 20, 1997. These responses are required to contain answers to the following questions; 1) Root Cause of the deficiency, 2) Corrective Actions taken to correct the issue, and 3) Actions to prevent recurrence, once these responses are received and reviewed, Nuclear Oversight will be in a position to identify the areas to monitor and frequency. As a minimum, all of these Corrective Actions will be reviewed and statused to ensure timely completion and effectiveness in accordance with ComEd's approved Q.A. Program.
- ComEd has initiated an Action Plan to ensure that future Audits of A/E type vendors include a review, verification and assessment of the effectiveness of the following areas to preclude a similar occurrence; 1) Interfaces between ComEd and the Vendor, 2) the Design Control Process with a focus on Calculations and 3) Problem Identification and Notification. Overall, this should give ComEd a more detailed view of the effectiveness of the Q.A. Program being implemented by that vendor for the Safety-Related Design work they are performing for ComEd.

The schedule for the following audits is being developed:

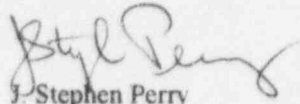
- Bechtel Engineering
- Duke Engineering
- Westinghouse (fuel and Nuclear Steam Supply System)
- GE (Nuclear Steam Supply System)
- Siemens (fuel)
- S&L follow-up

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If you have any questions concerning this letter please contact Russell Freeman, Dresden Station Engineering Manager at (815) 942-2929, ext. 3700.

Sincerely,



J. Stephen Perry  
Site Vice President  
Dresden Station

cc: U. S. NRC Document Control Desk  
J. F. Stang, Project Manager NRR  
C. L. Vanderniet, Senior Resident Inspector - Dresden Station  
Office of Nuclear Facility Safety - IDNS