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July 1, 1997

JSPLTR: 97-0122

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Dresden Nuclear Power Station Units 2 and 3 Reply to a Notice of Violation,  
Inspection Report 50-010; 237; 249/97011.  
NRC Docket Numbers 50-010, 50-237, and 50-249

Reference: J. A. Grobe letter to J. S. Perry, dated June 6, 1997, transmitting NRC  
Inspection Report 50-010; 237; 249/97011 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted in the referenced letter. Specifically, the violation involved the failure to include the reactor vessel level indication reference leg backfill function of the Control Rod Drive Hydraulic system within the scope of the maintenance rule.

An investigation determined that the installation of the backfill modification occurred after the initial scoping of the maintenance rule. A process was not in place at the time to ensure evaluation of modifications for impact on the maintenance rule program.

Dresden Station has reviewed the process used to capture structures, systems, and components into the scope of the maintenance rule and is revising the process to ensure compliance with the program.

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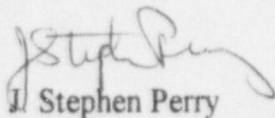
Accordingly, this letter contains the following new commitments:

- A comprehensive review of the UFSAR, Design Basis Documents (DBD) and Dresden Emergency Operating Procedures (DEOP) is being undertaken to identify structures, systems, and component (SSC) functions that may have been added or modified since initial scoping was accomplished. (NTS 2371009701101A)
- Dresden Administrative Procedure (DAP) 21-06, "Changes and Revisions to the Updated Final Safety Analysis Report" will be revised to add a requirement to the technical review section for an evaluation of the impact of the change on the maintenance rule program. (NTS 2371009701101B)

The attachment to this letter provides Dresden's reply to the Notice of Violation along with corrective actions to preclude recurrence.

If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, extension 3800.

Sincerely,



J. Stephen Perry  
Site Vice President  
Dresden Station

Attachment

cc: A. Bill Beach, Regional Administrator, Region III  
W. J. Kropp, Branch Chief, Division of Reactor Projects, Region III  
J. F. Stang, Project Manager, NRR (Unit 2/3)  
K. Riemer, Senior Resident Inspector, Dresden  
Office of Nuclear Facility Safety - IDNS  
File: Numerical

**ATTACHMENT**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-237/97011, 50-249/97011**

**VIOLATION:**

10 CFR 50.65(b)(1) requires, in part, the holders of an operating license shall include within the scope of the monitoring program specified in 10 CFR 50.65(a)(1), safety-related and nonsafety-related structures, systems, or components that are relied upon to remain functional during and following design basis events. Included are systems necessary to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, and the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the 10 CFR Part 100 guidelines.

Contrary to the above, as of May 7, 1997, for Units 2 and 3, the facility failed to include the reactor vessel level indication reference leg keep-fill function of the Control Rod Drive Hydraulics system within the scope of the maintenance rule.

**REASON FOR VIOLATION:**

The Maintenance Rule Program initial Structure, System or Component (SSC) scoping was accomplished in early 1995. The Control Rod Drive (CRD) Hydraulics system was modified (M-2(3)-93-004) in May 1995 to include the Reactor Vessel Water Level Indication System (RVWLIS) function. The Updated Final Safety Analysis Report (UFSAR) was revised to add this function in December 1995.

The UFSAR is the principal document that was used to identify SSC functions. Therefore, the initial SSC scoping did not identify the CRD RVWLIS backfill function, because this function had not yet been documented in the UFSAR.

A process for capturing SSC function changes due to plant modifications was added to Dresden Administrative Procedure (DAP) 21-03, "Processing Plant Design Changes" in November 1996. A review of modifications made from the time of initial scoping to the time of the change to DAP 21-03 was not made. There is no process for identifying new SSC functions or changes to SSC functions as a result of UFSAR revisions. Therefore, there was no process in place to identify new or changed SSC functions at the time M-2(3)-93-004 was implemented.



**CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:**

Upon identification, a Problem Identification Form (PIF) was generated, documenting that the RVWLIS backfill function of CRD had not been evaluated for scoping under the maintenance rule. A maintenance rule expert panel was convened. The RVWLIS backfill function of CRD was evaluated as being within the scope of the maintenance rule.

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:**

A comprehensive review of the UFSAR, Design Basis Documents (DBD) and Dresden Emergency Operating Procedures (DEOP) is being undertaken to identify SSC functions that may have been added or modified since initial scoping was accomplished. This review will be completed by September 1, 1997. (NTS 2371009701101A)

DAP 21-03, "Processing Plant Design Changes" was revised to provide a method to identify the effect of plant modifications on maintenance rule scoping. This revision was completed after the completion of the RVWLIS modification.

DAP 21-06, "Changes and Revisions to the Updated Final Safety Analysis Report" will be revised to add a requirement to the technical review section for an evaluation of the impact of the change on the maintenance rule program. This revision will be completed by August 1, 1997. (NTS 2371009701101B)

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Full compliance will be achieved by September 1, 1997, when a comprehensive review of the UFSAR, Design Basis Documents, and Dresden Emergency Operating Procedures is completed.