August 30, 2004

Mr. Christopher M. Crane President and Chief Nuclear Officer Exelon Nuclear Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

#### SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -DRESDEN NUCLEAR POWER STATION (REPORT 50-237/05-01; 50-249/05-01)

Dear Mr. Crane:

On August 11, 2004, the NRC staff completed its mid-cycle plant performance assessment of the Dresden Nuclear Power Station. The mid-cycle review involved the participation of all technical divisions in evaluating performance for the first half of the calendar year 2004 assessment cycle. The process included a review of performance indicators (PIs) for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections that may conflict with your plant activities.

Plant performance for both Units 2 and 3 for the most recent quarter was within the Regulatory Response Column of the NRC's Action Matrix, based on (1) the White Unit 3 high pressure coolant injection (HPCI) safety system unavailability PI in the Mitigating Systems Cornerstone which went White in the third quarter of 2001 due to the fault exposure hours following the Unit 3 HPCI water hammer event on July 5, 2001; and the White Unit 2 unplanned scrams per 7000 critical hours PI in the Initiating Events Cornerstone which went White in the second quarter of 2004.

In response to the White Unit 2 unplanned scrams PI, a supplemental inspection will be conducted in accordance with Inspection Procedure 95001 on October 4-8, 2004.

Additionally, the staff has identified a substantive cross-cutting issue in the area of human performance involving a number of findings over the previous 12 months. Examples include failure of an instrument maintenance supervisor to verify restoration of lifted leads on the Unit 2 HPCI system which would have prevented the automatic realignment of the HPCI pump suction to its safety-related water source; failure of maintenance workers to properly implement work instructions to reassemble the Unit 3 emergency diesel generator fuel oil pump and discharge piping resulting in failure of its 24-hour endurance run on two occasions; the lack of a process for post-maintenance flushing/purging of instrument air lines, failure to schedule stator water cooling temperature controller tuning, and failure to establish monitoring of stator water cooling generator inlet temperature as a critical parameter resulting in a Unit 2 manual scram;

and failure of a control room unit supervisor to use valid instrumentation for monitoring Unit 2 reactor pressure during testing which resulted in the inadvertent opening of the Target Rock relief valve. We will continue to monitor human performance through the baseline inspection program.

The enclosed inspection plan details the inspections scheduled through March 31, 2006. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Please note that there is an Independent Spent Fuel Storage Installation (ISFSI) procedure scheduled during the period. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last twelve months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

### /**RA**/

Steven A. Reynolds, Acting Director Division of Reactor Projects

Docket Nos. 50-237; 50-249 License Nos. DPR-19; DPR-25

Enclosure: Dresden Inspection/Activity Plan

See Attached Distribution

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| OFFICE | RIII     |   | RIII      |  |  |  |  |
|--------|----------|---|-----------|--|--|--|--|
| NAME   | MRing:rj | ; | SReynolds |  |  |  |  |
| DATE   | 08/25/04 |   | 08/26/04  |  |  |  |  |

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C. Crane

Site Vice President - Dresden Nuclear Power Station cc w/encl: Dresden Nuclear Power Station Plant Manager Regulatory Assurance Manager - Dresden Chief Operating Officer Senior Vice President - Nuclear Services Senior Vice President - Mid-West Regional **Operating Group** Vice President - Mid-West Operations Support Vice President - Licensing and Regulatory Affairs Director Licensing - Mid-West Regional **Operating Group** Manager Licensing - Dresden and Quad Cities Senior Counsel, Nuclear, Mid-West Regional Operating Group Document Control Desk - Licensing Assistant Attorney General Illinois Department of Nuclear Safety State Liaison Officer Chairman, Illinois Commerce Commission

C. Crane

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## Dresden Inspection / Activity Plan 09/01/2004 - 03/31/2006

| Unit   |                              |   | No. of Staff | Planned Dates |            | Inspection           |  |
|--------|------------------------------|---|--------------|---------------|------------|----------------------|--|
| Number | Inspection Activity          | Title   | on Site      | Start         | End        | Туре                 |  |
|        | IP 95001 - SUPPI             | LEMENTAL INSPECTION FOR WHITE PI  | 1            |               |            |                      |  |
| 2, 3   | IP 95001                     | Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area |              | 10/04/2004    | 10/08/2004 | Supplemental Program |  |
|        | ISI 3 - INSER                | VICE INSPECTION UNIT 3  | 1            |               |            |                      |  |
| 2, 3   | IP 7111108G                  | Inservice Inspection Activities - BWR   |              | 11/08/2004    | 11/12/2004 | Baseline Inspections |  |
|        | 71121.02 - ALARA             | A (OUTAGE)  | 1            |               |            |                      |  |
| 2, 3   | IP 7112102                   | ALARA Planning and Controls   |              | 11/04/2004    | 11/10/2004 | Baseline Inspections |  |
|        | 71122.02 - RADW              | ASTE & TRANSPORTATION   | 1            |               |            |                      |  |
| 2, 3   | IP 7112202                   | Radioactive Material Processing and Transportation                                  |              | 01/31/2005    | 02/04/2005 | Baseline Inspections |  |
|        | MOD/5059 - MODIF             | FICATIONS/50.59 INSPECTION  | 3            |               |            |                      |  |
| 2, 3   | IP 7111102                   | Evaluation of Changes, Tests, or Experiments  |              | 02/07/2005    | 02/11/2005 | Baseline Inspections |  |
| 2, 3   | IP 7111117B                  | Permanent Plant Modifications   |              | 02/07/2005    | 02/11/2005 | Baseline Inspections |  |
|        |                              | NIAL FIRE PROTECTION  | 3            |               |            |                      |  |
| 2, 3   | IP 7111105T                  |   |              | 03/14/2005    | 04/01/2005 | Baseline Inspections |  |
|        |                              | ERCISE & EP PI INSPECTION   | 2            |               |            |                      |  |
| 2, 3   | IP 7111401                   | Exercise Evaluation   |              | 03/07/2005    | 03/11/2005 | Baseline Inspections |  |
| 2, 3   | IP 71151                     | Performance Indicator Verification  |              | 03/07/2005    | 03/11/2005 | Baseline Inspections |  |
|        |                              | IIAL MAINTENANCE RULE INSPECTION  | 1            |               |            |                      |  |
| 2, 3   | IP 7111112B                  |   |              | 04/11/2005    | 04/15/2005 | Baseline Inspections |  |
|        |                              | DLOGICAL EFFLUENT CONTROL   | 1            |               |            |                      |  |
| 2, 3   | IP 7112201                   | Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems            |              | 04/25/2005    | 04/29/2005 | Baseline Inspections |  |
| 2, 3   |                              | Performance Indicator Verification  |              | 04/25/2005    | 04/29/2005 | Baseline Inspections |  |
|        |                              |   | 1            | 05/04/0005    | 00/00/0005 |                      |  |
| 2, 3   | IP 60855<br>71121.01 - RADIO | Operation Of An ISFSI DLOGICAL ACCESS CONTROL                                       | 1            | 05/01/2005    | 06/30/2005 | Other Routine        |  |
| 0.0    | IP 7112101                   |   | 1            | 08/01/2005    | 00/05/2005 | Deceline Increations |  |
| 2, 3   |                              | Access Control to Radiologically Significant Areas                                  |              |               | 08/05/2005 | Baseline Inspections |  |
| 2, 3   | IP 71151<br>SSDPC - SAFE     | Performance Indicator Verification <b>FY SYSTEM DESIGN &amp; PERFORMANCE</b>        | 5            | 08/01/2005    | 08/05/2005 | Baseline Inspections |  |
| 2, 3   | IP 7111121                   | Safety System Design and Performance Capability                                     | 5            | 09/05/2005    | 09/23/2005 | Baseline Inspections |  |
| 2, 3   |                              | DEN INIT PREP 08/2005   | 3            | 09/05/2005    | 09/23/2003 | baseline inspections |  |
| 2      | W90124                       | OL - INITIAL EXAM - DRESDEN - AUG/SEP 2005  | 5            | 08/29/2005    | 09/02/2005 | Not Applicable       |  |
| 2      |                              | DEN INIT EXAM 09/2005   | 3            | 00/29/2003    | 03/02/2003 |                      |  |
| 2      | W90124                       | OL - INITIAL EXAM - DRESDEN - AUG/SEP 2005  | Ū            | 09/19/2005    | 09/23/2005 | Not Applicable       |  |
| -      |                              | 2 ISI INSPECTION  | 1            | 50, 10,2000   | 50,20,2000 |                      |  |
| 3      | IP 7111108G                  | Inservice Inspection Activities - BWR   | -            | 10/31/2005    | 11/11/2005 | Baseline Inspections |  |
| 0      |                              |   |              | 10/01/2000    | 11,11,2000 |                      |  |

This report does not include INPO and OUTAGE activities. This report shows only on-site and announced inspection procedures. Page 2 of 2

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# Dresden Inspection / Activity Plan 09/01/2004 - 03/31/2006

| Unit   |                     |                                    | No. of Staff | Planne     | d Dates    | Inspection           |
|--------|---------------------|------------------------------------|--------------|------------|------------|----------------------|
| Number | Inspection Activity | Title                              | on Site      | Start      | End        | Туре                 |
|        | 71121.02 - OUTAG    | GE ALARA                           | 1            |            |            |                      |
| 2, 3   | IP 7112102          | ALARA Planning and Controls        |              | 11/14/2005 | 11/18/2005 | Baseline Inspections |
| 2, 3   | IP 71151            | Performance Indicator Verification |              | 11/14/2005 | 11/18/2005 | Baseline Inspections |
|        | HTSINK - HEAT       | SINK BIENNIAL                      | 1            |            |            |                      |
| 2, 3   | IP 7111107B         | Heat Sink Performance              |              | 02/06/2006 | 02/10/2006 | Baseline Inspections |

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