July 27, 2000

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: DRESDEN INSPECTION REPORT 50-237/007(DRP); 50-249/007(DRP)

Dear Mr. Kingsley:

On June 28, 2000, the NRC completed an inspection at Dresden Units 2 and 3. The results were discussed with Mr. R. Fisher and other members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC determined that one violation of NRC requirements occurred due to the failure to follow procedures while executing an operability evaluation for a leak on the 2D containment cooling service water pump on April 21, 2000. As a consequence, the 2D containment cooling service water pump was incorrectly considered operable. The inspectors evaluated this issue under the Significance Determination Process, and determined that this issue was of very low safety significance (GREEN). This issue has been entered into your corrective action program and is discussed in the summary of findings and in the report. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A.1 of the Enforcement Policy. This NCV is described in the subject inspection report. If you contest this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-001; and the NRC Resident Inspector at the Dresden facility.

In accordance with 10 CFR 2.790 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 http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,
Original signed by
Mark Ring, Chief

Mark Ring, Chief
Reactor Projects Branch 1

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

Enclosure: Inspection Report 50-237/2000007(DRP);
50-249/2000007(DRP)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President, Nuclear Operations
H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
P. Swafford, Site Vice President
R. Fisher, Station Manager
D. Ambler, Regulatory Assurance Manager
M. Aguilar, Assistant Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

DOCUMENT NAME: C:\dres ir-00-007.wpd

| OFFICE | RIII | | RIII | | | | | |
|---|---|---|---|---|---|---|---|---|
| NAME | RLerch:dp | | MRing | | | | | |
| DATE | 07/ /00 | | 07/ /00 | | | | | |

**OFFICIAL RECORD COPY**

ADAMS Distribution:
AJM
DFT
LWR (Project Mgr.)
J. Caldwell, RIII w/encl
B. Clayton, RIII w/encl
SRI Dresden w/encl
DRP w/encl
RIDSRGN3DRS w/encl
RIII_IRTS
JRK1
BAH3

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

| | |
|---|---|
| Docket Nos: | 50-237; 50-249 |
| License Nos: | DRP-19; DRP-25 |
| Report No: | 50-237/200007(DRP); 50-249/200007(DRP) |
| Licensee: | Commonwealth Edison Company (ComEd) |
| Facility: | Dresden Nuclear Power Station, Units 2 and 3 |
| Location: | 6500 North Dresden Road<br>Morris, IL 60450 |
| Dates: | May 9 through June 28, 2000 |
| Inspectors: | D. Smith, Senior Resident Inspector<br>B. Dickson, Resident Inspector<br>D. Roth, Resident Inspector<br>R. Zuffa, Illinois Department of Nuclear Safety |
| Approved by: | Mark Ring, Chief<br>Reactor Projects Branch 1<br>Division of Reactor Projects |

# NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

| **Reactor Safety** | **Radiation Safety** | **Safeguards** |
|---|---|---|
| ● Initiating Events | ● Occupational | ● Physical Protection |
| ● Mitigating Systems | ● Public | |
| ● Barrier Integrity | | |
| ● Emergency Preparedness | | |

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

SUMMARY OF FINDINGS

IR 05000237-00-07, IR 05000249-00-07; Commonwealth Edison; Dresden Nuclear Station; Units 2 & 3. Operability Evaluations.

The report covers a seven week period of resident inspection. The inspection identified one green issue, which was a Non-Cited Violation. The significance of issues is indicated by their color (green, white, yellow, red) and was determined by the Significance Determination Process in Inspection Manual Chapter 0609.

**Mitigating Systems**

- GREEN. The licensee failed to declare the 2D containment cooling service water pump inoperable and repair the pump after discovering evidence of leakage from a weld on the pump's discharge piping. A Non-Cited Violation (NCV) was documented for failing to follow procedures during execution of the operability evaluation to address leakage from an ASME Class 3 system.

  The unavailability of the 2D containment cooling service water pump was of very low risk significance due to the availability of other mitigating systems. (Section R15).

## Report Details

### Summary of Plant Status

Unit 2 started the period at full power. On May 14 and 26, 2000, the licensee reduced power to about 85 percent and 80 percent, respectively, to perform routine surveillance tests and non-routine maintenance on the feedwater heating system. In both cases, full power was restored in about a day.

Unit 3 entered the period at full power. On May 27, 2000, the licensee took the Unit 3 main generator off line to make slip ring repairs, while the unit remained critical. The repairs were completed and full power was restored by May 31, 2000.

## 1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

### 1R01 Adverse Weather (71111.01)

a. Inspection Scope

On May 19, 2000, the inspectors assessed the licensee's implementation of adverse weather procedures in responding to high winds to ensure that the mitigation systems were protected from these adverse weather conditions. The assessment included review of Dresden Operating Abnormal Procedure 0010-02, "Tornado Warning/Severe Winds," Revision 4, for harsh weather conditions that occurred on May 18, 2000.

b. Issues and Findings

There were no findings identified.

### 1R04 Equipment Alignments (71111.04)

a. Inspection Scope

The inspectors performed a detailed walkdown of the accessible portions of the systems listed. The inspectors verified that the systems were properly aligned. Instrumentation valve configurations and appropriate meter indications were also observed. Proper installation of hangers and supports were observed during the walkdown, and operational status of support systems was verified by direct observation of various parameters. Control room switch positions for the systems were observed. Other conditions such as adequacy of housekeeping, the absence of ignition sources, and proper labeling, were also evaluated.

Mitigating Systems Cornerstone

Unit 3, Division 2, Low Pressure Coolant Injection (LPCI) System
Unit 3 Containment Cooling Service Water (CCSW) System
Unit 3 High Pressure Coolant Injection (HPCI) System (partial walkdown)
Unit 2 and 3 Main Control Room
Unit 2 and 3 Emergency Diesel Generator Rooms
Unit 2and 3 Essential 4160 Volt Switchgear Rooms
Unit 2 and 3 Spent Fuel Pool Area
Unit 2 and 3 Emergency Core Cooling System Pump Rooms
Unit 2 and 3 Shutdown Cooling Pump Rooms
Unit 2 and 3 125 Vdc Battery Rooms
Unit 2 and 3 System Auxiliary Transformer and Main Power Transformer Area
Unit 2 and 3 Turbine Building

b. Issues and Findings

There were no findings identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors toured plant areas important to reactor safety to observe conditions related to licensee control of transient combustibles and ignition sources. The inspectors also assessed the material condition, operational lineup, and operational effectiveness of fire protection systems, equipment and features.

The inspectors walked down the following fire zones:

Mitigating Systems

Unit 2 High Pressure Coolant Injection Room ----fire zone 11.2.3
Unit 3 High Pressure Coolant Injection Room ----fire zone 11.1.3
Unit 2 Low Pressure Coolant Injection Southeast Corner Room----fire zone 11.2.2
Unit 2 Low Pressure Coolant Injection Southwest Corner Room----fire zone 11.2.1
Unit 3 Low Pressure Coolant Injection Southeast Corner Room ----fire zone 11.1.2
Unit 3 Low Pressure Coolant Injection Southwest Corner Room----fire zone 11.1.1
Unit 2 Containment Cooling Service Water Pump Area----fire zone 8.2.2.A
Unit 3 Containment Cooling Service Water Pump Area----fire zone 8.2.2.B
Unit 3 Isolation Condenser----fire zone 1.1.2.5.A
Unit 2 Isolation Condenser----fire zone 1.1.1.5.A
Unit 3 Fuel Pooling Cooling Pump Area----fire zone 1.1.1.4

b. Issues and Findings

There were no findings identified.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors observed and assessed the performance of operators in the control room and in the simulator to identify deficiencies and discrepancies in performance and training. The inspectors assessed the performance of operating crew #1 in the simulator on May 24, 2000, for scenario S-P-1. The scenario included a feedwater level control setpoint oscillation, an instrument line break in the drywell, and reactor pressure vessel flooding.

b. Issues and Findings

There were no findings identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors independently verified the implementation of the maintenance rule by verifying that systems were properly scoped within the maintenance rule. The inspectors also assessed the licensee's characterization of the failed structures, systems, and components. The inspectors verified that issues were identified at an appropriate threshold and entered into the corrective action program.

The inspectors reviewed the licensee's implementation of the maintenance rule requirements for the following systems:

Mitigating Systems

Unit 3 Isolation Condenser
Unit 2 Low Pressure Coolant Injection System
Unit 3 Low Pressure Coolant Injection System
Unit 2 Emergency Diesel Generator

Barrier Integrity System

Unit 2 Process Radiation Monitoring

b. Issues and Findings

There were no findings identified.

1R13 Maintenance Work Prioritization (71111.13)

a. Inspection Scope

The inspectors evaluated risk considerations for the following planned or emergent work:

Mitigating Systems Cornerstone

Unit 3 Reactor Building Closed Cooling Water Pipe Hangers
Unit 3 3D Low Pressure Coolant Injection Pump Maintenance
Unit 3 3D Low Pressure Coolant Injection Pump Motor Seal Replacement
Unit 2 2D Containment Cooling Service Water Discharge Flange Weld Repair

Barrier Integrity System Cornerstone

Unit 3 Drywell Floor Drain Sump Pump

Initiating Events Cornerstone

Unit 3 Feedwater Control System
Unit 2 Reactor Feed Pump Room Heating, Ventilation, and Air Conditioning Ductwork Repair

b. Issues and Findings

There were no findings identified.

1R14 Personnel Performance During Non-Routine Plant Evolutions (71111.14)

a. Inspection Scope

The inspectors reviewed personnel performance during a Unit 3 feedwater level transient that occurred on May 25, 2000. The review included direct observation of operator response and review of the procedures executed.

Procedures reviewed included Dresden Operating Abnormal Procedure 0600-01, "Transient Level Control," Revision 28.

b. Issues and Findings

There were no findings identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the technical adequacy of operability evaluations to ensure that the operability evaluations were properly justified, the system remained available, and no unrecognized increase in risk occurred.

The review included the following operability evaluations:

Mitigating System Cornerstone

Operability Determination/#ER00-024 - Discharge Piping for 2D Containment Cooling Service Water Pump

Operability Determination #00-018 - Main Turbine Valve Failure During Testing

Operability Determination #ER00-002 - HPCI Automatic Suction Swap due to High Torus Water Level.

b. Issues and Findings

2D CCSW Leakage

On April 14, 2000, the licensee ran the 2D Containment Cooling Service Water (CCSW) pump in support of other plant activities. During the run, the licensee noted wetness on a weld on the discharge piping of the pump. The licensee also noted that a puddle of rusty colored water was directly beneath the weld. The discharge piping of the 2D CCSW pump was classified as American Society of Mechanical Engineers (ASME) Code Class 3. The system engineer and the in-service inspection coordinator inspected the weld on April 17 and 18, and identified that the paint on the weld was cracked and brittle. However, wetness of the weld or additional puddles of water were not noted at that time. The licensee documented this information in condition report #D2000-02302.

In further investigating the possibility of a leak on April 21, 2000, the licensee performed the quarterly surveillance test on the pump. The testing would provide additional information regarding actual leakage and the capability of 2D CCSW pump. However, before starting the pump, the system engineer observed that the weld on the 2D CCSW pump discharge piping was again wet. The pump achieved the required flowrate of 3700 gpm during testing. Based on the test results, the licensee determined that the 2D CCSW pump was operable and did not require a formal operability evaluation. The licensee decided the pump and piping were operable even though there had been several indications of leakage (weld wetness (identified on two separate occasions), puddle of water underneath discharge piping, paint on weld cracked and brittle),

On April 27, 2000, the inspectors questioned station management regarding the licensee's conclusions that the 2D CCSW pump was not leaking. The licensee replied that the wetness did not constitute a leak and that a leak was characterized by actual flow. The inspectors disagreed with the licensee.

On April 29, 2000, the licensee completed operability evaluation No. 00-23, and concluded that the 2D CCSW pump remained operable based on the following: 1) the 2D CCSW pump met the Technical Specification flowrate requirements; 2) the weld leak was within the make-up capability of the keep-fill system; and; 3) the flawed weld was determined, using engineering judgement, to maintain structural integrity until a non-destructive examination could be performed on the weld on August 30, 2000.

The licensee used NSP-CC-3001, Rev. O, "Operability Determination Process" to prepare the evaluation. In Attachment A of NSP-CC-3001, step 4 states:

> Confirm that the determination does not rely on any of the following (invalid) arguments:...
>
> c. Determination that leakage from ASME Class 1, 2, or 3 component pressure boundary (pipe wall, valve body, pump casing, etc.) Is acceptable. (Exception to this criterion is provided only for ASME Class 3 moderate energy lines per G. L. 90-05, "Guidance for Temporary Non Code Repair.")

Criterion V of 10 CFR Part 50, Appendix B, required that activities affecting quality shall be accomplished in accordance with procedures. Contrary to this, on April 29, 2000, the licensee failed to follow the requirements of NSP-CC-3001 when the licensee accepted operability evaluation No. 00-23, even though the evaluation had concluded that the leakage through the ASME Class 3 CCSW piping was acceptable. As a consequence, the 2D CCSW pump was incorrectly considered operable. This violation is being treated as a non-cited violation (NCV), consistent with Section VI.A.1, of the NRC Enforcement Policy **(NCV 50-237/2000007-01(DRP))**. This issue is in the licensee's corrective action program as Condition Report No. D2000-02302.

Subsequently, on June 7, 2000, during a 2D CCSW pump run, the licensee identified that the 2D CCSW pump was spraying water through the previously identified flaw in a weld on the pump's discharge piping. The licensee did not declare the system inoperable. Instead, the licensee reentered the operability evaluation process and was using operability evaluation No. 23 to create operability evaluation No. 24 to address the spray. The inspectors again questioned the appropriateness of this approach. Following the involvement of additional licensee personnel with ASME Code expertise, the licensee concluded that the 2D CCSW pump and piping system was inoperable. Subsequently, the licensee isolated the system, entered the 30-day Limiting Condition for Operation of Technical Specification 3.8.A.1, and made an ASME-code repair to the system.

Significance Determination Process

The inspectors assessed the licensee's failure to restore the 2D CCSW pump within the Technical Specification allowed outage time of 30 days using the NRC's Significance Determination Process. The inspectors evaluated the unavailability of the 2D CCSW pump during all plant transients.

1) Transient (Reactor Trip)
2) Transients (without Power Conversion)
3) Loss of 125VDC
4) Loss of Service Water ----was not impacted by the loss of one train of CCSW
5) Small Loss of Coolant Accident (LOCA)
6) Inadvertent Open Relief Valve
7) Medium LOCA
8) Large LOCA

9) Loss of Offsite Power
10) Loss of Offsite Power with loss of one emergency AC power source
11) Anticipated Transient Without Scram (ATWS)

In assessing each of the 11 transients, the inspectors accounted for the availability of other mitigating systems such as, the power conversion system, isolation condenser, and a form of containment heat removal by either the suppression pool cooling mode of low pressure coolant injection or core spray. Because these other mitigating systems were considered available, or were credited as being available by simple operator actions, the inspectors concluded that this issue was of very low safety significance, "GREEN," during the Significance Determination Process Phase 2 evaluation for each transient.

1R19 Post Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed and/or observed the following post maintenance tests:

Mitigating Systems Cornerstone

Unit 3 Rod Worth Minimizer Relay Replacement Tested on May 25, 2000
Unit 3 Linear-Variable Differential Transmitter and Jucomatic Solenoid Testing on 3B Reactor Feed Pump Feedwater Regulating Valve on May 26, 2000.
Unit 2 Containment Cooling Service Water Pump on May 18, 2000.

Barrier Systems Cornerstone

Unit 2 and 3 "A" Standby Gas Treatment System on May 16, 2000
Unit 3 Drywell Water Level Switch on May 28, 2000

b. Issues and Findings

There were no findings identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed surveillance testing on risk-significant equipment. The inspectors verified that the selected plant equipment could perform intended safety functions and satisfied the requirements contained in Technical Specifications, the Updated Final Safety Analysis Report, and licensee procedures. The inspectors verified that the tests were adequate to prove operational readiness consistent with the design and licensing basis documents and that the testing acceptance criteria were clear. The tests were performed as-written and all testing prerequisites were satisfied. The test data sheets were complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the tests, the inspectors verified that the

test equipment was removed, and that the equipment was properly restored to standby conditions.

The following surveillance testing activities were observed:

Mitigating System Cornerstone

Unit 2 Quarterly Technical Specification 2A Standby Liquid Control Pump Surveillance - DOS 1100-04 (work request (WR)# 990151089)

Unit 2 Quarterly Technical Specification 2B Standby Liquid Control Pump Surveillance - DOS 1100-04 (WR# 990151090)

Unit 2 Quarterly 2B Standby Liquid Control Tank Heater Surveillance - DOS 1100-04 (WR# 990151093)

Unit 2/3 Quarterly Diesel Oil Transfer Pump Test for In-service Test (IST) Program - DOS 6600-14 (WR#990159784 01)

Unit 2 Quarterly Diesel Generator Cooling Water Pump Test for Operational Readiness and In-service Test (IST) Program - DOS 6600-08 (WR#990149469 01)

Unit 2 Diesel Generator Surveillance Test - DOS 6600-01 (WR#990166571 01)

Station Blackout 2(3) Diesel Generator Endurance and Margin/Full Load Test/Full Load Reject Test - DOS 6620-01 (WR#990172707 01)

Unit 2 Diesel Generator Monthly Surveillance Testing - DOS 6600-01 (WR#990173840)

Unit 2/3A Standby Gas Treatment System Monthly Operability Test - DOS 7500-02 (WR#990177498)

Unit 3 Main Steam Line Isolation Valve Closure Scram Circuit Functional Test - DOS 0500-08 (WR# 9901727112)

Unit 3 Computer Feed Water Flow Calibration - DTS 8733 (WR#990183832)

a. Issues and Findings

There were no findings identified.

Emergency Preparedness (EP) Cornerstone

1EP1 Drill, Exercise, and Actual Events (71114.06)

b. Inspection Scope

On May 24, 2000, the inspectors assessed the performance of operating crew #1 in providing the proper emergency classification (Unusual Event) during the simulator evaluation for scenario S-P-1. The scenario included a feedwater level control setpoint oscillation, an instrument line break in the drywell, and reactor pressure vessel flooding. The inspectors reviewed Emergency Plan Implementing Procedure 0200-T1, "Classification of GSEP Conditions," Revision 5, as part of the inspection.

c. Issues and Findings

There were no findings identified.

## 4. OTHER ACTIVITIES (OA)

OA1 Performance Indicator Verification (71151)

a. Inspection Scope

To perform a periodic review of performance indicator data to determine their accuracy and completeness, the inspectors reviewed a sample of plant records and data against the reported performance indicators. The review included records in the maintenance rule database, the control room logs, and the corrective action process. The review included the following indicators:

Initiating Events System Cornerstone

Unit 2 and Unit 3 Scrams
(1998 through 2000)

Mitigating Systems Cornerstone

Unit 2 and Unit 3 Residual Heat Removal (Shutdown Cooling System)
(1998 through 2000)
Unit 2 High Pressure Coolant Injection System
(First quarter 2000 and June 1997 through December 1999)
Unit 3 Emergency Diesel Generator
(1998 through 2000)

Barrier Integrity Cornerstone

Unit 2 and 3 Reactor Coolant System Activity
(First quarter 2000)

b. Issues and Findings

During the review of the residual heat removal performance indicator, the inspectors identified that the licensee had 90 minutes of previously uncounted inoperability time on February 9, 2000. This was documented in Problem Identification Form/Condition Report PIF/CR# D2000-03231. However, frequently asked question (FAQ) #146 of the Nuclear Energy Institute (NEI) 99-02, Revision 0, "Regulatory Assessment Performance Indicator Guideline," clarified that shutdown cooling system outage hours are counted only when the shutdown cooling system function is required by the Technical Specifications. This has the potential to eliminate most outage hours for the shutdown cooling system, including the hours discovered by the inspector. In PIF/CR#D2000-02592, the licensee had previously documented that Revision 0 to NEI 99-02 reduced the number of required reporting hours relative to Draft D of NEI 99-02. At the end of the inspection period, the licensee had not completed its plan (Action Tracking Item (ATI) #28540) for reviewing and revising past unavailability hours using the NEI 99-02 Rev. 0 guidance.

4OA4 Management Meetings

The inspectors presented the inspection results to Mr. Fisher and other members of licensee management at the conclusion of the inspection on June 28, 2000. The licensee acknowledged the findings presented. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Ambler, Regulatory Assurance Manager
P. Boyle, Chemistry Manager
P. Chabot, Site Engineering Manager
R. Fisher, Station Manager
A. Haeger, NLA - Regulatory Services
B. Hanson, Shift Operations Superintendent
J. Harlach, Industrial Safety and Hygiene Advisor
R. Kelly, NRC Coordinator
W. Liscomb, Training Manager
J. Moser, Radiation Protection Manager
M. Pacilio, Operations Manager
R. Peak, Design Engineering Manager
M. Riegel, Acting Nuclear Oversight Manager
R. Whalen, System Engineering Manager

NRC

D. Roth, Dresden Resident Inspector
D. Smith, Dresden Senior Resident Inspector

IDNS

R. Zuffa, Illinois Department of Nuclear Safety

ITEMS OPENED, CLOSED, AND DISCUSSED

| | | |
|---|---|---|
| Opened | | |
| 50-237/2000007-01 | NCV | Failure to follow operability evaluation procedure |
| Closed | | |
| 50-237/2000007-01 | NCV | Failure to follow operability evaluation procedure |

## LIST OF BASELINE INSPECTIONS PERFORMED

The following inspectable-area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

| Inspection Procedure | | Report |
|---|---|---|
| Number | Title | Section |
| 71111-01 | Adverse Weather Preparations | 1R01 |
| 71111-04 | Equipment Alignment | 1R04 |
| 71111-05 | Fire Protection | 1R05 |
| 71111-11 | Licensed Operator Requalification | 1R11 |
| 71111-12 | Maintenance Rule Implementation | 1R12 |
| 71111-13 | Maintenance Work Prioritization & Control | 1R13 |
| 71111-14 | Non-Routine Evolutions | 1R14 |
| 71111-15 | Operability Evaluations | 1R15 |
| 71111-19 | Post Maintenance Testing | 1R19 |
| 71111-22 | Surveillance Testing | 1R22 |
| 71114-06 | Drill, Exercise, and Actual Events | 1EP6 |
| 71151 | Performance Indicator Verification | 4OA2 |
| 71153 | Event Follow-up | 4OA3 |
| (none) | Other | 4OA4 |
| (none) | Management Meetings | 4OA5 |

LIST OF ACRONYMS AND INITIALISMS USED

| | |
|---|---|
| ASME | American Society of Mechanical Engineers |
| ATI | Action Tracking Item |
| ATWS | Anticipated Transient Without Scram |
| CCSW | Containment cooling service water |
| CAR | Code of Federal Regulations |
| FAQ | Frequently Asked Question |
| HPCI | High Pressure Coolant Injection |
| IDNS | Illinois Department of Nuclear Safety |
| IST | In-service Testing |
| LOCA | Loss of Coolant Accident |
| LPCI | Low Pressure Coolant Injection |
| NEI | Nuclear Energy Institute |
| NCV | Non-Cited Violation |
| PIF/CR | Problem Identification Form/Condition Report |
| WR | Work Request |