

February 6, 2001

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 - NRC INSPECTION REPORT 50-237/01-05(DRS);  
50-249/01-05(DRS)

Dear Mr. Kingsley:

On January 26, 2001, the NRC completed a baseline inspection at your Dresden Nuclear Power Station, Units 2 and 3. The results of this inspection were discussed with Mr. P. Swafford and other members of your staff on January 26, 2001. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to emergency preparedness 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. Specifically, this inspection focused on the implementation of your emergency preparedness program. In addition, we reviewed your staff's evaluation of the performance indicators for the Emergency Preparedness Cornerstone.

No findings of significance were identified.

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).

O. Kingsley

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We will gladly discuss any question you have concerning this inspection.

Sincerely,

**/RA/**

Gary L. Shear, Chief  
Plant Support Branch  
Division of Reactor Safety

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

Enclosure: Inspection Report 50-237/01-05(DRS);  
50-249/01-05(DRS)

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

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D. Ambler, Regulatory Assurance Manager  
M. Aguilar, Assistant Attorney General  
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 50-237/01-05(DRS); 50-249/01-05(DRS)

Licensee: Commonwealth Edison Company

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: 6500 N. Dresden Road  
Morris, IL 60450

Dates: January 22-26, 2001

Inspector: Thomas J. Ploski, Emergency Preparedness Analyst

Approved by: Gary L. Shear, Chief, Plant Support Branch  
Division of Reactor Safety

# 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

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

## Radiation Safety

- Occupational
- Public

## Safeguards

- Physical Protection

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 05000237-01-05(DRS), 05000249-01-05(DRS), on 01/22-26/01, Commonwealth Edison Company, Dresden Nuclear Power Station, Units 2 and 3. Emergency Preparedness.

The report covers a one week period of announced inspection by a regional emergency preparedness inspector. No findings of significance were identified.

## Report Details

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

#### 1EP2 Alert and Notification System (ANS) Testing

##### a. Inspection Scope

The inspector discussed with corporate Emergency Preparedness (EP) staff the design, equipment, and periodic testing of the public ANS for the Dresden Station's Emergency Planning Zone (EPZ). The inspector also reviewed procedures and records for the twelve month period ending September 2000 related to ANS testing, annual preventive maintenance, and non-scheduled maintenance. The inspector reviewed the licensee's criteria for determining whether each model of siren installed in the EPZ would perform as expected if fully activated. Records used to document and trend component failures for each model of installed siren were also reviewed.

##### b. Findings

No findings of significance were identified.

#### 1EP3 Emergency Response Organization (ERO) Augmentation Testing

##### a. Inspection Scope

The inspector reviewed semi-annual, off-hours staff augmentation drill procedures, related year 2000 drill records, primary and backup provisions for off-hours notification of the Dresden Station's, Emergency Operations Facility's (EOF), and Joint Public Information Center's (JPIC) emergency responders, and the current ERO rosters for the Dresden Station, EOF, and JPIC. The inspector reviewed and discussed corporate and Station EP staffs' provisions for maintaining and distributing ERO call out lists.

##### b. Findings

No findings of significance were identified.

#### 1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

##### a. Inspection Scope

The inspector reviewed and discussed Nuclear Oversight (NO) staffs' audit and Field Observation reports for year 2000 on the Dresden Station's and corporate office's EP programs. The inspector also reviewed a sample of Condition Reports (CR) related to the Station's EP program in order to determine whether related corrective actions were acceptably completed as indicated.

b. Findings

No findings of significance were identified.

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspector reviewed and discussed the licensee's methods and procedures for assessing information used to determine the values for the following three PIs for time periods ending September 30, 2000: ANS, ERO Drill Participation, and Drill and Exercise Performance (DEP). Records of relevant Control Room Simulator training sessions, periodic ANS tests, and excerpts of drill and exercise evaluations were also reviewed.

b. Findings

No findings of significance were identified.

**4. OTHER ACTIVITIES**

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the preliminary inspection results to Mr. P. Swafford and other members of licensee management and staff on January 26, 2001. The licensee acknowledged the information presented and did not identify any information discussed as proprietary.

## PARTIAL LIST OF PERSONS CONTACTED

### Licensee

D. Ambler, Regulatory Assurance Manager  
A. Appel, Corporate EP Staff  
G. Bockholdt, Instrument Maintenance Superintendent  
K. Bowman, Operations Manager  
C. Dieckmann, Nuclear Oversight Manager  
S. DuPont, Regulatory Affairs Staff  
R. Fisher, Station Manager  
T. Fisk, Chemistry Manager  
M. Friedman, EP Coordinator  
R. Kelly, Regulatory Affairs Staff  
W. Lipscomb, Training Manager  
S. McCain, Corporate EP Manager  
J. Moser, Radiation Protection Manager  
D. Nestle, Health Physicist  
R. Norris, Radiation Protection Engineering Supervisor  
H. Oclon, Nuclear Oversight Assessor  
C. Oshier, Technical Support Supervisor  
W. Stoffels, Maintenance Manager  
P. Sunderland, Corporate EP Staff  
P. Swafford, Site Vice President  
S. Tulley, Corporate EP Staff  
D. VanAken, EP Trainer

### NRC

B. Dickson, Resident Inspector  
D. Smith, Senior Resident Inspector

## ITEMS OPENED, CLOSED, AND DISCUSSED

### Opened

None

### Closed

None

### Discussed

None

## LIST OF ACRONYMS USED

ANS	Alert and Notification System
CAN	Community Alert Network
CR	Condition Report
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
EOF	Emergency Operations Facility
EP	Emergency Preparedness
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
JPIC	Joint Public Information Center
NO	Nuclear Oversight
NOA	Nuclear Oversight Assessment
NRC	Nuclear Regulatory Commission
PI	Performance Indicator

## LIST OF DOCUMENTS REVIEWED

### Assessments and Audits

NOA-00-00-PS05, "Corporate Emergency Preparedness Program"  
NOA-00-00-PS05, "Assessment Plan - Corporate Emergency Preparedness Program"  
NO Field Observation, "Organization and Administration"  
NO Field Observation, "Evaluation of Adequacy of Interfaces"  
NO Field Observation, "Training and Qualification"  
NO Field Observation, "Instructions, Procedures, and Practices"  
NO Field Observation, "Document Control"  
NO Field Observation, "Emergency Planning"  
NO Field Observation, "Storage of Records"  
NO Field Observation, "PI-Alert and Notification System"  
NO Field Observation, "Drill on 8-2-00"

### Miscellaneous

Generating Stations Emergency Plan  
Dresden Station Annex to the Generating Stations Emergency Plan  
Dresden Off-site Siren Test Plan, Revision 1  
Siren Trending Report 1999  
Semi-annual Siren Trending Report - January through June 2000  
Daily and monthly siren operability test results for October 1999 through September 2000  
ANS annual preventive maintenance records for August through November 2000  
Dresden Station, EOF and JPIC off-hours staff augmentation drill records for year 2000  
Memo dated December 19, 2000, "Offsite Agency Meeting - 2000"  
Memo dated November 1, 2000, "Designation of Simulator Sets for NRC PI Data Collection"

### Condition Reports (CR)

D1999-01565; D2000-00200; D2000-01281; D2000-01856; D2000-02293; D2000-03131;  
D2000-03717; D2000-04349; D2000-06039; D2000-06311; D2000-06824; D2001-00447;  
D2001-00462

### Procedures

EP-AA-112, Attachment 2A, "Nuclear Duty Officer," Revision 0  
EP-AA-112, "ERO/Emergency Response Facility Activation and Operation," Revision 0  
EP-AA-112, Attachment 4, "Station Off-hours Augmentation Using CAN," Revision 0  
OP-AA-101-502, "Accidents Involving the Transportation of Rad Materials," Revision 1  
NO-AA-200-001, "Continuous Oversight Process," Revision 1  
RS-AA-122-108, "PI - ERO Drill/Exercise Performance," Revisions c, d, 0, and 1  
RS-AA-122-109, "PI - ERO Drill Participation," Revisions d, 0, and 1  
RS-AA-122-110, "PI - ANS Reliability," Revisions 0 and 1