

AUG 11 1977

Docket No. 50-237

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Vice President
P. O. Box 767
Chicago, IL 60690

Gentlemen:

This will acknowledge receipt of your letter dated July 7, 1977, informing us of the steps you have taken to correct the items of noncompliance and other matters which we brought to your attention in our Notice of Violation dated June 14, 1977.

With respect to your response to the items of noncompliance, we have the following comments and questions:

1. Item 1.a - Your response states that the 30 second period limit has been deleted from Procedure DGP 1-1. This suggests that any period in excess of 5 seconds is acceptable. What guidance is being provided to the operator relative to the minimum reactor period allowed during startup and the actions to be taken by the operator when this limit is exceeded?
2. Item 1.c - Your response states that Procedure DGP 1-1 will be revised to remove the requirement that the reactor period be recorded. While this change is not prohibited, we wish to remind you that the Technical Specifications require reporting to the NRC of reactor periods less than 5 seconds. As such, it would appear prudent to continue to maintain records of the reactor periods.

We have no questions or comments concerning your response to the other items of noncompliance listed in our June 14 Notice of Violation.

Concerning your response to the items of concern set forth in our letter, we have the following comments and questions:

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1. Item 2 - What steps are being taken to analyze core conditions ahead of time to determine when unusually high control rod notch worths may exist? What steps are being taken to alert operators of the potential for high worth rods?
2. Item 3 - It is our understanding that no one immediately evaluated the potential for exceeding the Technical Specification limit of 1.3%Δk for any inserted rod segment. Your letter notes that the reactor operator saw no anomalies of sufficient significance to raise a question with respect to compliance with that limit. What guidance is available to the operator to assist him in promptly determining those anomalies which are of sufficient significance to warrant further evaluation before proceeding with operations?
3. Item 4 - Commonwealth Edison's response disagreed with our view that the stationing of three people at the control panel indicates that startup with a short period was expected and would be tolerated. No additional information was provided, however, regarding conditions which existed at the time of the reactor restart to change our view from that originally stated.

Please provide, within twenty days of your receipt of this letter, the information requested regarding noncompliance item 1.a and items numbered 1 and 2 above.

If you have any questions, please contact us.

Sincerely,

Harold D. Thornburg, Director
Division of Reactor Operations
Inspection, IE

cc: Mr. B. B. Stephenson,
Station Superintendent

bcc:	HDThornburg	DJSkovholt, DPM	Enforcement	ROI Reading
PDR	WPEllis	JCrooks, MIPC	Coordinators -RI-V	ADEC Chron
NSIC	FIngram, PA	DOR, Grotenhuis	XOOS Reading File	Anthony
LPDR	JPMurray, ELD	State of Illinois	EDO Reading File	Roisman, Esq.,
TIC	JLieberman, ELD/IE Files		IE Reading File	Attorney
EVOlgenau	MGrossman, ELD	Central Files	LConstable	
JGDavis				

OFFICE	FC:ROI:IE	ADEC:ROI:IE	D:ROI:IE		
SURNAME	GLConstable: LD	JHShutezek	HDThornburg		
DATE	8/10/77	8/10/77	8/10/77		