

Repro.

MAY 12 1981

Docket No. 50-10
Docket No. 50-237
Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

Thank you for your letter dated April 21, 1981, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report Nos. 50-10/81-02; 50-237/81-03 and 50-249/81-02 forwarded by our letter dated March 24, 1981. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely,

R. F. Heishman, Acting Director
Division of Resident and
Project Inspection

cc: J. S. Abel, Director
of Nuclear Licensing
D. J. Scott,
Station Superintendent

cc w/ltr dtd 4/21/81:
Central Files
Reproduction Unit NRC 20b
AEOD
Resident Inspector, RIII
PDR
Local PDR
NSIC
TIC
Mary Jo Murray, Office of
Assistant Attorney General

RIII
[Signature]
Reimann/jp
5/8/81

RIII *[Signature]*
Knop
[Signature]

RIII *[Signature]*
Heishman
[Signature]



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 21, 1981

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 1, 2, and 3
Response to IE Inspection Report
Nos. 50-10/81-02, 50-237/81-03 and
50-249/81-02
NRC Docket Nos. 50-10/237/249

Reference (a): R. F. Heishman letter to C. Reed
dated March 24, 1981.

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection
conducted by Messrs. T. Tongue and M. Jordan on January 1 through
January 30, 1981.

Appendix A to Reference (a) identified one item of
noncompliance with NRC requirements. Our response to this item of
noncompliance is provided in Attachment A.

To the best of my knowledge and belief the statements
contained herein and in the attachment are true and correct. In
some respects these statements are not based on my personal
knowledge but upon information furnished by other Commonwealth
Edison employees. Such information has been reviewed in accordance
with Company practice and I believe it to be reliable.

Very truly yours,

C. Reed

C. Reed
Vice President of
Nuclear Operations

Attachment

cc: RIII Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 22nd day
of April, 1981

Nancy M. Dascenzo
Notary Public

APR 23 1981

ATTACHMENT A

COMMONWEALTH EDISON
ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION

The item of noncompliance identified in Appendix A of the NRC letter dated March 24, 1981 is responded to in the following paragraphs.

1. As a result of the inspection conducted on January 1-30, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50 Appendix B, Criterion XIV requires that measures be established for indicating the operating status of structures, systems, and components of the nuclear power plant..., such as tagging valves and switches to prevent inadvertant operation. Dresden Administrative Procedure (DAP 3-5) states it's purpose in part, "This procedure will provide a record of the equipment status before, during, and after an outage so that abnormal system configurations can be evaluated." CECo Quality Assurance Manual procedure 3-52 states the Shift Engineer will take appropriate action and remove equipment from service and when satisfactory, clear the outage and declare the system or component operable.

Contrary to the above, on January 27 and 28, 1981, while several outages were in progress on the 3A Reactor Feedwater Pump (RFP), a drain valve in the RFP's minimum flow piping was opened and the change in valve status was not included in the outage documentation, nor was the Shift Engineer informed of the change in status. When the outages were cleared on January 28, 1981, the valve was inadvertantly left open, resulting in increased condenser air inleakage, increased air ejector flow, an increase in off gas activity, and the potential for a unit trip.

Corrective Action Taken and Results Achieved

The shift foreman who was involved in making the change to the drain valve has been individually retrained to ensure awareness of the importance of adding new items to the original outage documentation. In addition, information will be added to the training material for all shift personnel reinforcing the need to record all items which are taken out of service subsequent to the original outage. This information will be conveyed to all shift personnel as part of their next "every sixth week" training session.

Corrective Action Taken To Avoid Further Non-Compliance

Because of the singular nature of the event and that the person involved as well as all shift personnel are aware of the requirements for adding equipment to an outage, no further action is deemed necessary.

Date When Full Implementation Will Be Achieved

The shift personnel training sessions will be completed by May 15, 1981.