



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

Central File

December 27, 1978

Mr. J. A. Hind, Chief
 Safeguards Branch
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, Illinois 60137

Subject: Licensee's Response to IE Inspection
 Report No. 50-237/78-26
 Dresden Station Unit 2
 NRC Docket No. 50-237

Reference (a): J. A. Hind letter to B. Lee, Jr.
 dated December 8, 1978

Dear Mr. Hind:

The following is in response to an inspection conducted by Mr. J. P. Patterson on October 23-26 and Mr. A. G. Finley on October 31 thru November 2, 1978 of activities at Dresden Station Unit 2 pursuant to 10 CFR 70, "Special Nuclear Material." Reference (a) indicated that one item appeared to be in noncompliance with NRC requirements.

The areas examined during this inspection concern a subject matter which is exempt from disclosure according to Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Consequently, this response should not be placed in the Public Document Room. Therefore, the corrective action regarding the noncompliance identified has been submitted as a separate attachment to this letter.

Please direct any additional questions on this matter to this office.

Very truly yours,

C. Reed

Cordell Reed
 Assistant Vice-President

attachment

8002040002

~~10 CFR 2.790 INFORMATION
 WITHHOLD FROM PUBLIC DISCLOSURE~~

JAN 2 1979 *w*



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

CENTRAL FILES

DEC 06 378

Docket No. 50-237

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

Gentlemen:

This refers to the inspection of your Dresden Unit 2 generating station conducted by Mr. J. P. Patterson October 23-26 and Mr. A. G. Finley October 31 to November 2, 1978, of this office. Your activities pursuant to Title 10, Code of Federal Regulations, Part 70, "Special Nuclear Material" as they pertain to License No. DPR-19 were the subject of the inspection. Our findings were discussed with Mr. Brent Shelton, Administrative Assistant to Superintendent, and other members of the Plant Superintendent's staff at the conclusion of the inspection on November 2, 1978.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

Areas examined during this inspection concern a subject matter which is exempt from disclosure according to Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Consequently, the enclosure to this letter, our report of this inspection, and your response to the noncompliance identified in the enclosure to this letter will not be placed in the Public Document Room. Therefore, your statement of corrective action regarding the noncompliance identified in the enclosure should be submitted as a separate enclosure to your transmittal letter.

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This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further non-compliance; and (3) the date when full compliance will be achieved.

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

Sincerely,

J. A. Hind, Chief
Safeguards Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report
No. 50-237/78-26
(Part 2.790(d) Information)

cc w/encls:

Mr. B. B. Stephenson,
Station Superintendent
Central Files
Reproduction Unit NRC 20b

cc w/Appendix A, w/o
Inspection Report

PDR
Local PDR

ENCLOSURE CONTAINS
10 CFR 2.790 (c) INFORMATION

OFFICE	RIII <i>[Signature]</i>	RIII <i>[Signature]</i>	RIII <i>[Signature]</i>	RIII <i>[Signature]</i>		
SURNAME	Finley/bk	Patterson	Hind	Barker		
DATE	12/7/78					

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison
Company

Docket No. 50-237

Based on the inspection conducted between October 23 and November 2, 1978, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as indicated below. This item is categorized as a deficiency.

10 CFR 70.54 - Each licensee who transfers and each licensee who receives special nuclear material shall complete and distribute a Nuclear Material Transaction Report on Form NRC-741, in accordance with printed instructions for completing the form, whenever he transfers or receives a quantity of special nuclear material of one gram or more of contained uranium-235, uranium-233 or plutonium.

Contrary to 10 CFR 70.54 and referenced instructions for completing the Form NRC-741, some Forms NRC-741, prepared by the licensee corporate office, representing transfers of special nuclear materials were not dispatched on the same date the material was shipped as required.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-237/78-26

Docket No. 50-237

License No. DPR-19

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Generating Station, Unit 2

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: October 23-25 and October 31-November 2, 1978

Inspectors: *J. A. Hind*
A. G. Finley 12/7/78

J. A. Hind
J. P. Patterson 12/7/78

Approved By: *J. A. Hind*
J. A. Hind, Chief 12/7/78
Safeguards Branch

Inspection Summary

Inspection on October 23-26 and October 31 November 2, 1978 (Report No. 50-237/78-26)

Areas Inspected: Material Control and Accountability including facility organization and operation; measurements and control; storage and internal controls; shipping and receiving; records and reports; inventory and inventory verification; and management of material control system. The inspection involved 45 inspector-hours onsite by two NRC inspectors.

Results: Of the seven areas inspected, no apparent items of noncompliance or deviations were identified in six areas; one apparent item of noncompliance/deficiency - failure to dispatch Forms NRC-741 on the same day material was shipped (Paragraph 7).

Details (Part 2.790(d) Information)

S-F3-78-230
Copy 3 of 7 copies
10 Pages.

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DETAILS

1. Persons Contacted

T. Rausch, Lead Engineer
 L. Stevens, Nuclear Engineer, Unit 2
 *J. Doxsey, Nuclear Engineer Assistant

*Denotes attendance at exit interview.

2. Facility Organization and Operation

The Dresden Unit 2 nuclear procedures are part of the Commonwealth Edison Company nuclear procedures for all Commonwealth Edison owned and operated reactors as they pertain to material accountability and control. Statements of responsibility and delegations in writing, where required, have been established for those positions having responsibility for receiving, shipping, inventory, storage, internal transfers, and signing and distributing Forms NRC-741 and 742. A Nuclear Component Transfer List (Form C) is utilized for internal transfers between ICA's and also prepared for new fuel receipts and fuel shipments. These moves are preplanned and the Form C is approved by the Nuclear Materials Custodian, Technical Staff Supervisor and if a core alteration is involved, the Assistant Superintendent. Upon completion of the transfers the Form C is reviewed by the Operating Engineer, Technical Staff Supervisor and Nuclear Materials Custodian. Each internal move on Form C is initialed by the Fuel Handling Foreman. A copy of the Form C is distributed to the Nuclear Fuel Services, Nuclear Fuel Data Bank at the licensee's corporate office as input to maintain balances and control by ICA. Official licensee records for gram values by ICA and fuel assembly accountability are maintained in the Nuclear Fuel Data Bank operated by the Director of Nuclear Fuel Services located at the licensee's corporate office in Chicago. An additional perpetual record maintained at the reactor site by the Nuclear Material Custodian is the fuel assembly card (Form E) for each fuel assembly reflecting serial numbers, all transfers, current location and disposition.

Reactor inventories are conducted of all nuclear fuel assemblies by serial number and location prior to initial fuel loadings and each time the reactor head is removed. In addition, a piece count inventory of the reactor vessel is required whenever the reactor head is removed for more than one month, and each month the reactor head is off. A piece count of the fuel pool inventory is conducted

and documented monthly, and a required annual inventory of the fuel pool is taken by serial number and location. The annual inventory may serve in lieu of a monthly piece count inventory.

Establishment and description of Item Control Areas (ICA's) at Dresden 2 are as follows.

- a. ICA-VD2 - Dresden 2 Fuel Vault
- b. ICA-PD2 - Fuel Pool
- c. ICA-RD2 - Reactor

The Fuel Vault is a single facility used by both Dresden 2 and 3.

Amendment No. 34 to License No. DPR-19 dated January 30, 1978 authorizes an increase in spent fuel storage from 1160 to 1420 fuel assemblies. Commonwealth Edison Company has purchased aluminum storage racks from General Electric to provide for an additional 260 locations in both Unit 2 and 3. None have been used in Unit 2, but racks to accommodate 160 fuel positions were installed in Unit 3 until cracks were observed. The aluminum racks in Unit 3 have been emptied as a result of the cracks. Negotiations are under way with General Electric to modify these racks for future use. In the meantime, the licensee by letter dated May 11, 1978 requested an amendment to both licenses DPR-19 and DPR-25 for authorized use of high density storage racks with a fuel storage capacity for both Units 2 and 3 of 3780 storage spaces for each unit.

Company auditors from the corporate audit staff observe at least annually the reactor inventory if applicable, the fuel vault inventory and the fuel pool inventory. Initial fueling, refueling or core rearrangements are also observed by the corporate audit staff.

As a result of the SNM records and report review it was determined that possession and use of SNM has been confined to the location and purposes authorized by license No. DPR-19.

3. Measurement and Controls

Thermal power data is reported as an hourly output from an in plant process computer. These hourly totals are totalled daily and daily amounts recorded on a monthly summary sheet along with electrical generation from the load sheets. If the computer malfunctions or is inoperative for any hourly period, manual calculations are made and inserted on the monthly summary sheets. At the bottom of each monthly sheets MWD thermal and number of items are calculated along

with the capacity factor for the reactor for that particular month. The megawatt hours thermal for the month are sent to the Nuclear Fuel Data Bank at the corporate office in Chicago for use with burnup data which is computed there. These monthly Mw hr t should check with the amounts reported to the NRC Graybook.

These monthly thermal output data in Mw hr t were compared by the inspector with the NRC Graybook data from July, 1975 to September, 1978. All amounts checked satisfactorily except for November, 1975. The plant generated data was approximately 49,000 Mw hr t greater than the amount reported in the NRC Graybook. The discrepancy was due largely to omission of posting the Mw hr t for the 18th day of the month, on which the computer data was unavailable, but manually calculated data was not substituted as procedure requires. This amounted to 43,822 Mw hr t of the total difference of 48,822 Mw hr t. The corporate office did use the corrected revision of 1,349,489 Mw hr t for input to burnup computer program, although the incorrect total was sent to the NRC Graybook for recording there.

Uranium depletion and plutonium production were calculated by the inspector for the six NRC-742 reporting periods since the previous inspection. This included part of Cycle 4 through the present Cycle 6 for the Dresden 2 Unit. Exposure rates in megawatt days per metric tonne were obtained for the beginning and ending of each cycle in the inspection period. These rates are computed by the licensee in standard tons which were then converted to metric tonnes. With this data plus average core enrichments and amount of fuel assemblies in each cycle reloading, the following comparison of Dresden 2's reported data with that calculated by the NRC inspector was made. Pertinent data referred to above was supplied by the Nuclear Engineer assigned to the Dresden 2 reactor.

IN GRAMS

	<u>Dresden 2*</u>	<u>NRC Calculated</u>	<u>% Diff.</u>
7/1/75-12/31/75			
MWDt 348,196			
Uranium	475,717	483,823	+1.70
Uranium-235	241,571	259,515	+7.43
Plutonium	115,451	114,736	> -0.62

Report of Fuel Inventory

1/1/76-6/30/76
MWDt 205,940

Uranium	292,024	288,607	- 1.17
Uranium-235	135,845	156,405	+15.13
Plutonium	65,849	70,308	+ 6.77

7/1/76-3/31/77
MWDt 572,802

Uranium	748,627	787,820	+ 5.24
Uranium-235	389,029	417,283	+ 7.26
Plutonium	182,514	180,650	- 1.02

4/1/77-9/30/77
MWDt 278,354

Uranium	355,690	363,101	+ 2.08
Uranium-235	163,600	179,287	+ 9.59
Plutonium	70,645	68,026	- 3.71

10/1/77-3/31/78
MWDt 236,814

Uranium	338,444	336,388	- 0.66
Uranium-235	184,358	182,365	- 1.08
Plutonium	92,335	86,365	- 6.47

4/1/78-9/30/78
MWDt 372,374

Uranium	505,468	511,030	+ 1.10
Uranium-235	257,853	269,934	+ 4.69
Plutonium	116,664	116,314	- 0 -

* These reported amounts include minor adjustments from previous reporting periods as stated on the respective NRC-742.

These comparisons are satisfactory. The reported licensee data reflects adjustments made in July 1975 when in plant computer data was first used rather than that generated by an off-line computer program supplied by General Electric, the fuel supplier. These amounts now reported represent more accurately the actual amount of depletion and production being generated during reactor operations.

4. Shipping and Receiving

All Dresden 2 receipts of nuclear fuel for the period of inspection agreed by piece count and fuel assembly serial number with the shipper's data reflected on Forms NRC-741.

Receiving Reports (Form A) and Nuclear Fuel Component Transfer Forms (Form C) are prepared by the reactor site for incoming fuel. The Form C is initialed by the Fuel Handling Personnel and both Forms A and Form C are verified and approved by the Nuclear Materials Custodian and Station Superintendent. Forms A and Forms C are submitted to the Comptroller's Staff to verify entry in the nuclear fuel data bank maintained as official records at the licensee's corporate office. The Nuclear Fuel Data Bank maintains a computer data balance for each fuel assembly and for shipments upon receipt of the Form C from the reactor site prepares a Form NRC-741 with gram values for both element and isotope. The Form NRC-741 is held in abeyance until the Nuclear Material Custodian notification by telephone that the shipment has been released.

A fuel assembly card is maintained at the reactor site for each fuel assembly and reflects the fuel assembly serial number, fuel assembly movements and current location. SNM values for fuel assemblies are maintained by the isotopic inventory program at the Nuclear Fuel Data Bank.

For the period of inspection there were 14 Forms NRC-741 representing receipt of 372 fuel assemblies and 34 Forms NRC-741 representing shipment of 524 fuel assemblies.

5. Storage and Internal Control

The licensee maintains in addition to fuel assembly cards for each fuel assembly which reflect serial numbers and ICA locations, a current fuel vault inventory sheet, a fuel pool inventory sheet and a core diagram that also reflect serial numbers and locations. The primary internal document is the Nuclear Fuel Component Transfer List (Form C) which is prepared for all new receipts, shipments and internal moves. The Form C is utilized to post and update fuel assembly cards, as input to the Nuclear Fuel Data Bank and to update ICA inventory sheets.

All new fuel receipts for the period of inspection were agreed to Receiving Reports (Form A) and Form C by serial number and location in addition to agreement by serial number with Forms NRC-741. All

shipments were agreed by serial number to Forms NRC-741 and by serial number to Form C's to verify numbers and quantity shipped. All 724 fuel assemblies in the reactor and 508 fuel assemblies in the fuel pool were agreed by serial number and location to the fuel assembly cards and current ICA tag records and no exceptions noted.

6. Inventory

The Dresden 2 reactor core consists of 724 fuel assemblies. The Spent Fuel Pool presently contains 508 irradiated fuel assemblies. The Dresden 2 Fuel Vault was empty of cold fuel assemblies at the time of inspection.

The reactor core is inventoried prior to each fuel loading and also each time the reactor head is removed. Records of core inventories were reviewed by the inspector for Cycle 5 and the current Cycle 6 fuel loading. The Spent Fuel Pool and the Fuel Vault are inventoried by serial number and piece count semi-annually. This also was verified by the inspector for the inspection period since November, 1975. All records of licensee inventories were documented properly by those performing the inventory and each signed off by a supervisory engineer and dated as required by the Commonwealth Edison Nuclear Procedures.

To verify the present inventory of the Spent Fuel Pool 132 locations were selected by the inspector. All were identified correctly by location and serial number when compared with the tag board mounted in the wall near the pool. This was 132 out of 508 or approximately 26% of the total assemblies present. The boroscope utilized plus the clarity of the pool water made serial number identification easier than in previous inspections.

7. Records and Reports

The licensee was found in apparent noncompliance with 10 CFR 70.54 and related instructions (Page 3) for not dispatching Forms NRC-741 on the same day the material was shipped. Of the 34 Forms NRC-741 prepared for shipments, 19 were not dispatched the same day the material was shipped. A breakdown of these 19 documents and the elapsed time before dispatch in days after shipment is as follows:

10 documents - 1 day	1 document - 5 days
3 documents - 2 days	1 document - 6 days
1 document - 3 days	1 document - 8 days
1 document - 4 days	1 document - 11 days

Official SNM values are computerized and maintained on ICA basis at the Nuclear Fuel Data Bank, Commonwealth Edison Company Office based on input from the reactor site. The reactor site has a process computer, OD-12 (OD - on demand) tied in with reactor operation capable of determining power distribution every four hours, programmed to determine every 24 hours burnup and production of fuel assemblies. A monthly printout is obtained from the OD-12 and these values utilized for monthly ICA burnup, production and reactor site SNM values. A General Electric Boiling Water Reactor System (GEBS) off-line computer is utilized to adjust the monthly OD-12 computer system for changes due to refueling, cycle reloads and core shuffles.

All Forms NRC-741 for receipts and shipments were available and agreed to facility activity as reported on Forms NRC-742 for the inspection periods. Forms NRC-741 for external receipts were signed and distributed within the required 10 day period. As previously noted, some Forms NRC-741 for external shipments were not dispatched on the same day material was shipped.

Material Status Reports (Forms (NRC-742) have been prepared and filed for the six reporting periods as required by 10 CFR 70.53 to reflect the Dresden 2 activities for the period of inspection. Balances obtained by the inspector for these six reporting periods were in agreement with licensee reported balances.

Review of Forms NRC-741 revealed that all transfers of SNM have been to and from authorized recipients as required by 10 CFR 70.42.

The attached Exhibits A and B reflect the Dresden 2 activity for enriched uranium and plutonium for the period of inspection. The following is a reconciliation of the fuel assembly activity for Dresden 2 for the audit period (November 10, 1975 to November 2, 1978).

No. of fuel assemblies previous inspection (050-237/75-24)	1384
No. of fuel assemblies received	372
No. of fuel assemblies shipped	<u>524</u>
Balance on hand 11/2/78	1232

There was no cold fuel for Dresden 2 in the new fuel vault. Of the 1232 fuel assemblies on hand, there were 724 in the reactor core and 508 in the spent fuel pool.

The licensee records system provides sufficient information to comply with the requirements of 10 CFR Part 70 as they pertain to operating nuclear power reactors.

8. Management of Material Control System

The licensee by their own procedures requires a company auditor, independent of the site Nuclear Engineering Group, to participate and test inventory practices during the annual inventory, initial refueling, subsequent refuelings or rearrangement of fuel in the reactor. On October 21 and October 25, 1976, the Corporate Audit Staff accompanied by a representative of Arthur Anderson and Company verified the Unit 2 and Unit 3 core inventory during refueling. Report of findings to management was made on December 27, 1976. Noted was two instances of NRC-741's being signed the working day following the day of shipment. No response was required.

The Corporate Audit Staff on April 26 and 27, 1977, observed the inventory of nuclear fuel storage pools and vaults at the Dresden Station. Report of findings to management on May 31, 1977, no exceptions noted. The Corporate Audit Staff observed inventories of Unit 1 and Unit 2 storage pools on May 3 and 5, 1978. Findings were reported in a letter dated June 20, 1978, no exceptions noted.

9. Exit Interview

The inspector met with Mr. B. Shelton, Administrative Assistant to the Superintendent, Mr. D. Adams, Technical Staff Supervisor, Mr. R. Stobert, Quality Assurance, Mr. G. Reardanz, Quality Assurance and licensee representative (denoted in paragraph 1) at the conclusion of the inspection on November 2, 1978. In addition, Mr. J. Barker, NRC Resident Inspector, was present for part of the exit meeting.

The inspector noted that the inspection was a continuation of the inspection started during the previous week by Mr. J. P. Patterson of the NRC Region III Safeguards Branch.

The inspector presented the apparent item of noncompliance (deficiency) for not dispatching Forms NRC-741 the same day material was shipped as required by 10 CFR 70.54 and referenced instructions. The scope of the inspection including reviews conducted and findings were presented as they pertain to inventory and inventory verification, thermal power data, reported depletion and production, external fuel receipts and shipments. Also noted were the internal reviews performed to account for fuel assemblies by serial numbers and locations.

Part 2.790(d) Information

Also noted was Amendment No. 34 to License No. DPR-19 dated January 30, 1978, to authorize increased storage positions to provide for storage of 260 more fuel assemblies in spent fuel storage. Aluminum racks purchased were not utilized in Dresden 2 to provide this additional storage because of identified cracks. It was further noted that a letter to NRR dated May 11, 1978 requested an amendment to License No. DPR-19 for authorized use of high density racks in the fuel pool to provide for a storage capacity of 3780 fuel assemblies.

The licensee was informed that letters of designation for the positions of Plant Superintendent, Assistant Plant Superintendent, Nuclear Materials Safeguards Manager, Nuclear Materials Custodian and Nuclear Materials Safeguards Engineer as required by nuclear procedures were reviewed and determined to be current and in order.

Independent audits were performed by the Corporate Audit Staff as required and procedures reviewed were determined adequate as they pertain to an operating reactor.

Attachments: Exhibits A and B
(Part 2.790(d) Information)

PART 1 (U) Information

Dresden 2
 Commonwealth Edison Company - YVE
 Material Balance Report - Privately Owned Enriched Uranium
 For Period 11/1/75 - 9/30/78

	No. of Fuel Assays	Enriched Uranium In Grams	
		<u>U</u>	<u>U-235</u>
Beginning Inventory 11/1/75	1,384	261,943,451	3,897,087 ^{1/}
Receipts	<u>372</u>	<u>68,577,481</u>	<u>1,732,860</u>
Total to Account For	<u>1,756</u>	<u>330,520,932</u>	<u>5,629,947</u>
Shipments	524	100,396,149	1,848,358
Burnup		2,403,910	1,212,661
Ending Inventory 9/30/78	<u>1,232</u>	<u>227,720,873</u>	<u>2,568,928</u>
Total Accounted For	<u>1,756</u>	<u>330,520,932</u>	<u>5,629,947</u>

1/ From previous inspection 050-237/75-24.

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EXHIBIT A

Part 2.790(3) Information

Dresden 2
 Commonwealth Edison Company - YVE
 Material Balance Statement - Privately Owned Plutonium
 For Period 11/1/75 - 9/30/78

	<u>Pu</u>	Plutonium In Grams	<u>Isotope</u>
Beginning Inventory 11/1/75	981,637		793,571
Production	<u>566,704</u>		<u>388,451</u>
Total to Account For	<u>1,548,341</u>		<u>1,182,022</u>
Shipments	187,789		169,378
Pu-241 Decay	5,945		5,945
Ending Inventory 9/30/78	<u>1,354,607</u>		<u>1,006,699</u>
Total Accounted For	<u>1,548,341</u>		<u>1,182,022</u>

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Commonwealth Edison
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July 21, 1978

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

Subject: Dresden Station Units 1, 2 and 3
Response to IE Inspection Report
Nos. 50-10/78-15, 50-237/78-13
and 50-249/78-15
NRC Docket Nos. 50-10/237/249

Reference (a): A. B. Davis letter to B. Lee, Jr.
dated June 29, 1978

Dear Mr. Keppler:

The following is in response to an inspection conducted by Mr. L. R. Greger on April 27 and 28 and May 2-5, 1978 of activities at Dresden Station. Reference (a) indicated items that appeared to be in noncompliance with NRC requirements. Our response is enclosed in the attachment to this letter.

Please refer any additional questions you might have on this subject to this office.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

attachment

JUL 24 1978

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