

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station - Units 2 and 3

Docket Nos. 50-237; 50-249
Licenses No. DPR-19; DPR-25

During an NRC inspection conducted on May 17 through June 28, 1991, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

1. 10 CFR 50, Appendix B, Criteria XI, states, in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures . . .

Contrary to the above, for the period of initial operating licensee issuance thru June 28, 1991, the licensee failed to establish an adequate test program in that periodic calibration testing requirements were not established for safety-related fail-safe pressure actuation switches on specified reactor building ventilation air operated isolation dampers for Units 2 and 3 and for the Unit 2 emergency diesel generator cooling water local flow instrumentation.

This is a severity Level IV violation (Supplement I).

2. 10 CFR 50.72(b)(2)(i) requires notification of the NRC within four hours of the occurrence of any event that, had it been found while the reactor was in operation, would have resulted in the nuclear power plant being in an unanalyzed condition that significantly compromises plant safety.


Contrary to the above, on January 16, 1991, the NRC was not notified within four hours that Unit 2, had it been operating, would have been in an unanalyzed condition that significantly compromised plant safety when a review by the licensee identified reactor head studs that did not meet the material toughness requirements of the Final Safety Analysis Report.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D. C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation; or, if contested, the basis for disputing the violation, (2) the corrective steps that will be taken to avoid further violations, and (3) the date when full compliance

will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Date 7/15/91



Edward G. Greenman, Director
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