



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 1, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 3
Status of Corrective Actions
in Response to Notice of Violation
Inspection Report 50-249/91033
NRC Docket Numbers 50-249

References: (a) A.B. Davis letter to C. Reed dated December
19, 1991 transmitting Notice of Violation and
proposed Imposition of Civil Penalty

References: (b) T. Kovach letter to NRC dated January 16, 1992
transmitting response to Notice of Violation and
Proposed Imposition of Civil Penalty

Commonwealth Edison's (CECo) response to the Notice of Violation (NOV)
which was transmitted with Reference b, provided corrective actions
concerning additional radiation protection training. Specifically:

"The station will develop lesson plans addressing conduct of
radiologically challenging jobs to be used in department
continuing training. The lessons plans will be focussed at three
levels of radiation worker workers including: Radiation Protection
Department Personnel, supervisors and planners, and other
personnel who routinely perform work in radiologically controlled
areas. These lesson plans will be developed by March 31, 1992
with completion of the training by the end of the year."

Subsequent to the Dresden October 11, 1991, unplanned exposure event,
Nuclear Services Radiation Protection (NSRP) created a working
committee to review 1991 Company administrative overexposures. The
working committee reviewed and analyzed each station's Radiation
Protection Program with respect to exposure control to identify
potential weaknesses and to prepare Lessons Learned with specific
recommendations for each station. The committee's report was issued
on February 28, 1992, and contained 12 recommendations. Subsequent to
the LaSalle unplanned exposure event dated December 17, 1991, 3 additional
NSRP initiatives were developed. These focused on electronic
dosimetry, RPT training on identification of multiple radiation
sources, and pre-job briefings by maintenance and construction.
Recommendations from these initiatives are expected to be issued by
July 1, 1992. In addition, a Radiation Work Permit effectiveness
review was already in progress with an expected completion date of May
1, 1992.

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In light of these NSRP initiatives to comprehensively review exposure control, Dresden Station believes it is prudent to postpone development of the lesson plans for non-radiation protection personnel. The station wants to review the recommendations of the NSRP initiatives and utilize this information in preparing lesson plans. Given the time frame for completion, lesson plans for non-radiation protection personnel addressing radiologically challenging work are expected to be completed by September 1, 1992, with training scheduled to begin during the 4th quarter of 1992.

Because of the critical nature of their job, Dresden Radiation Protection Technician and Radiation Protection supervisors are currently attending continuing training on radiologically challenging jobs. These sessions are taught in conjunction with the mechanical maintenance department training on motor operated valves, their disassembly and ISI related activities. Additional training modules for RPTs on radiologically challenging jobs have been planned. These training modules will be updated with program changes that resulted from the task force recommendations.

If your staff has any questions or comments regarding this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

P.L. Burner
for

T.J. Kovach
Nuclear Licensing Manager

cc: A.B. Davis, Regional Administrator-Region III
B.L. Siegel, Project Manager, NRR
W.G. Rogers, Senior Resident Inspector, Dresden
M. Kunowski, Senior Radiation Protection Specialist-Region III