



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

April 8, 1992

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
 Status of Corrective Actions in Response to
 Notice of Violation Associated with
 Inspection Report 50-237/91022; 50-249/91022
 NRC Docket Numbers 50-237 and 50-249

- References:
- (a) W. D. Shafer letter to Cordell Reed dated September 12, 1991, transmitting NRC Inspection Report 50-237/91022; 50-249/91022
 - (b) T. J. Kovach letter, dated October 11, 1991, to USNRC transmitting Response to Notice of Violation associated with Inspection Report 50-237/91022; 50-249/91022

Commonwealth Edison Company (CECo) responded by Reference (b), to the Notice of Violation (NOV) which was transmitted with the Reference (a) letter and Inspection Report. Violation 2 from the NOV was associated with inadequate corrective actions related to a previous violation regarding NRC reporting. One of the corrective steps identified to be taken was:

- "5. A flow chart is being developed for the station, as an aid in ascertaining reportability requirements. This aid is expected to be available for use late in the fourth quarter 1991 or early in the first quarter of 1992."

Although a general flowchart has been made available, it is not developed sufficiently for use by the Operations Shift Management. As such, this letter is a notification that the intent of the cited corrective action was not met as scheduled. The following is a current status of the completion of this action.

In August 1991, CECo had identified a product that provided a reportability screening mechanism that was event-based, rather than regulation-based. The Tenera Reportable Event Decision System (TREDS) compiles and organizes generic commercial nuclear power plant reporting and related guidance by type of event. TREDS consists of an event-based decision tree (flowchart) which leads to potentially applicable reporting requirements. More detailed guidance information is provided in an interpretations section for that reporting requirement. This information provides guidance to the reviewer to assist in making a more informed reportability determination.

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In the Fall of 1991, it was believed that a major revision to NUREG 1022 was forthcoming and would be incorporated into TREDIS. As a result, the acquisition of TREDIS was delayed.

CECo decided in late 1991 to pursue TREDIS in its current form and to incorporate any NUREG 1022 revision when issued. TREDIS was delivered to CECo in late January 1992 and training by Tenera was conducted on March 9 and 11, 1992.

Based on a detailed review of TREDIS and the training provided, CECo determined that TREDIS was too generic to directly implement at the stations. TREDIS would require some customization in order to provide proper guidance to the Operations Shift Management on reportability. A detailed review of TREDIS is ongoing in order to implement a TREDIS Program in the Operations area. The customized TREDIS Program will be distributed and training initiated by August 31, 1992.

The TREDIS Program and the status on customization was reviewed with the Dresden NRC Resident Inspectors on April 1, 1992.

If there are any questions or comments regarding this response, please contact Perry Barnes, Compliance Supervisor, at 708/515-7278.

Sincerely,

P. L. Barnes for

T. J. Kovach
Nuclear Licensing Manager

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