



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 11, 1992

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Supplemental Response to Notice of Violation
Inspection Report 50-237/92002; 50-249/92002
NRC Docket Numbers 50-237 and 50-249

Reference: T. J. Kovach letter to Document Control Desk dated
April 10, 1992, Transmitting Response to Notice of
Violation.

The reference letter provided Commonwealth Edison's (CECo) response to a Notice of Violation related to adequacy of corrective actions. In the cover letter transmitting the response, CECo stated that an assessment would be performed to determine if additional actions are needed to ensure that corrective actions effectively preclude recurrence of events. The assessment has been completed and the purpose of this letter is to provide an update on Dresden's additional planned actions.

CECo's Corporate Safety Assessment Department and an industry consultant conducted the review. In general, the observations of this assessment included only additional examples of the types of weaknesses identified by the Dresden Situational Review Team in the Fall of 1991. These weaknesses were in the areas of communications, empowerment, and commitment management.

Action plans had been previously developed to address the three areas of weakness and are included in the Dresden Management Action Plan. Implementation of the plans is underway.

Dresden evaluated the Safety Assessment Department review and determined that additional action is necessary in the area of corrective actions. Recent extended discussions by Dresden Senior Management have addressed increasing the effectiveness of the commitment management process, which underlies the effectiveness of corrective actions. Several practices are being strengthened with the initiation of a station policy on commitment management. This policy which will be implemented by July 31, 1992, will: (1) establish management's expectations, (2) establish consequence management, (3) address accountability and (4) ensure adequate resource management.

Additionally, the implementation of the Integrated Reporting Program (IRP) has begun. IRP will guide Dresden's corrective action responses to provide: (1) a methodology to identify problems, (2) methods for investigating those problems, (3) identification of root cause(s), (4) development of corrective actions to prevent recurrence, and (5) data that can be used for trending.

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Beginning June 1, 1992, a sample of previously implemented corrective actions are being evaluated by the Corporate Performance Assessment Department as part of their functional area assessments. Also, Quality Programs and Assessments will evaluate the effectiveness of corrective actions implemented for NRC violations issued from June 1991 to May 1992. A report of the evaluation results will be issued by September 30, 1992.

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

Sincerely,

P. L. Barnes
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