



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 17, 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 50-237/90027; 50-249/90026
NRC Docket Numbers 50-237 and 50-249

References: (a) W. D. Shafer letter to Cordell Reed date January 17,
1991 transmitting Inspection Report 50-237/90027;
50-249/90026

(b) T. J. Kovach letter to A. B. Davis dated February 15,
1991 transmitting response to Notice of Violation

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. As part of the corrective actions cited in the Reference (b) violation response, Dresden had incorporated the guidance from an internal NRC memo related to what constitutes an ESF actuation into its policies for ESF reportability determinations.

Since that time, CECO has developed the Commonwealth Edison Reportability Manual. The Manual provides an event-driven system to assist in reportability determinations. The Manual also logically compiles and organizes reportability requirements and guidance.

There are two basic components of the system. Decision trees provide the user a "road map" to appropriate information needed to make reportability determinations. The second component is reportable event requirements which provide interpretive guidance to the user.

Training on use of the Manual has begun with full implementation expected by August 31, 1992. The guidance provided in the Manual will supercede all other reportability guidance previously disseminated. The Manual and its application has been reviewed with the Senior Resident Inspector

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Dr. Thomas E. Murley

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If your staff has any questions or comments concerning this letter, please refer them to Perry Barnes, Compliance Supervisor at (708) 515-7278.

Sincerely,

P. L. Barnes for

T.J. Kovach
Nuclear Licensing Manager

Attachment

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