

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

During an NRC inspection conducted on June 10 through August 6, 1992, 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 (1992), the violations are listed below.

1. Technical Specification 6.2.B requires that radiation control procedures be maintained, made available to all station personnel and adhered to.

- a. Procedure DAP 12-09, "ALARA Action Reviews," states, in part, that a pre-job briefing will be performed for workers and radiation protection technicians assigned to jobs involving exposure estimates in excess of 1 person-rem or smearable contamination levels in excess of 250,000 disintegrations per minute per 100 centimeters squared.

Contrary to the above, on May 12, 18, 19, 28, and 29, and June 8, 10, 15, and 16, 1992, pre-job briefings were not performed for workers and radiation protection technicians assigned to jobs involving exposure estimates in excess of 1 person-rem or smearable contamination levels in excess of 250,000 disintegrations per minute per 100 centimeters squared.

- b. Procedure DAP 12-25, "Radiation Work Permit Program," states, in part, that each worker performing a job under a Radiation Work Permit (RWP) must follow the requirements of the RWP.

Contrary to the above, on June 19, 1992, a worker performing a job under RWP 20356A did not follow a requirement of the RWP to wear dosimetry.

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

2. 10 CFR 20.203(b) requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution Radiation Area."

Contrary to the above:

- a. On June 17, 1992, a radiation area on the roof of the radwaste building was not posted.
- b. On July 20, 1992, a radiation area around a seavan was not posted.

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

3. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and which are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey"

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means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above:

- a. As of June 16, 1992, the licensee did not make surveys of the radwaste building roof to assure compliance with that part of 10 CFR 20.101 that limits the radiation exposure to the whole body.
- b. As of July 19, 1992, the licensee did not make surveys around a seavan to assure compliance with that part of 10 CFR 20.101 that limits the radiation exposure to the whole body.

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

The inspection showed that actions had been taken to correct the identified violations and to prevent recurrence. Consequently, no reply to the violations is required and we have no further questions regarding this matter.

Dated at Glen Ellyn, Illinois
this 18 day of September 1992.

Charles E. Norelius

Charles E. Norelius, Director
Division of Radiation Safety
and Safeguards