

## 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 August 1 through September 15, 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:

- A. Technical specification 4.6.C.2, Coolant Chemistry, requires a sample of reactor coolant be taken and analyzed every four hours for conductivity and chloride during startup and at steaming rates below 100,000 pounds per hour.

Contrary to the above, on August 6, 1992, a sample of reactor coolant was not taken or analyzed every four hours for chloride and conductivity during a startup with a steaming rate below 100,000 pounds per hour.

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

- B. Technical specification Table 3.2.4, Action A, requires 12 hour grab samples be collected and analyzed during service water effluent releases when the gross activity radiation monitor is inoperable.

Contrary to the above, on July 24, 1992, grab samples were not analyzed within the 12 hour period during service water effluent releases when the gross activity radiation monitor was inoperable.

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

- C. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and to be accomplished in accordance with these instruction, procedures, or drawings.

Dresden Alarm Notification 903-8 G-7, "U3 Diesel Generator Day Tank Level Hi/Lo," Operator action B.1 states "Direct an operator to check Day Tank Level Sight Glass, LG 3-5241-13 in the Diesel Generator Room."

Dresden Administrative Procedure 7-14, "Control and Criteria for Locked Equipment and Valves," A.2.a(5) requires manual vent and drain valves that could greatly degrade a system's operability be specified as a locked valve and have a physical restraint on the operation of the valve.

Dresden Administrative Procedure 7-27, "Independent Verification," B.1.b requires independent verifications be performed "apart in time" from the initial activity or status review. Section B.3.a(1) requires all manual valves in safety-related systems be independently verified whenever manipulated.

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Contrary to the above:

1. On swing shift July 14, 1992, an operator was not dispatched to check the Unit 3 day tank level sight glass following receipt of the Hi/Lo Day Tank Level Alarm.
2. As of July 14, 1992, the Unit 3 day tank drain valve, 3-5204-A-500, was not specified as a locked valve and did not have a physical restraint on operation of the valve.
3. On day shift July 14, 1992, the operator documenting independent verification of the closure of the Unit 3 drain valve, 3-5215-500, was involved in the evolution manipulating the drain valve and was not "apart in time" when the verification was performed.
4. On swing shift July 14, 1992, drain valve, 3-5204-A-500, was manipulated open and was not independently verified.

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

With respect to Item "C", the inspection showed that actions had been taken to correct the identified violation and to prevent recurrence. Consequently no reply to the violation is required and we have no further questions regarding this matter. With respect to Items "A" and "B", pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555, with a copy to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the Dresden Nuclear Station within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois  
this 2<sup>nd</sup> day of Oct. 1992

  
H. Brent Clayton, Chief,  
Reactor Projects Branch 1