NOTICE OF VIOLATION

Commonwealth Edison Company Units 2 and 3

Docket Nos. 50-237; 50-249 Dresden Nuclear Power Station Licenses No. DPR-19; No. DPR-25

During an NRC inspection conducted on October 26, 1992, through January 4, 1993, 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, the violations are listed below:

10 CFR 50, Appendix B, Criterion XVI, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are promptly identified and corrected.

Contrary to the above, in February and April 1992, the licensee identified oversized fuses in various safety related circuits including the Emergency Diesel Generator exciters and Low Pressure Coolant circuits. As of December 1992, this condition adverse to quality had not been corrected.

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

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure DOP 6900-07, Revision 9, "125Vdc Ground Detection," required that the procedure be immediately performed at DC system grounds above 60Vdc, and a B1 Work Request be submitted once the ground was located. Furthermore, the procedure required, at grounds above 115Vdc, initiation of a 14 day time clock (administrative limiting condition for operation (LCO)) to locate and remove the ground and the preparation of a Justification for Continued Operation (JCO) if the ground could not be located or isolated within 14 days.

Procedure DAP 07-05, Revision 9, "Operating Logs and Records," Paragraph B.5, required that when a Limiting Condition for Operation (LCO) entry occurs, the event be logged in the LCO log.

Contrary to the above:

- 1. On September 26, 1992, when a 125Vdc system ground was present in Unit 3, the licensee failed to initiate actions to locate and remove the ground. In addition, the licensee failed to initiate an administrative LCO and document the event in the LCO log.
- 2. On November 3, 1992, when 125Vdc grounds were present in both Units 2 and 3, an administrative LCO was initiated and logged in the LCO log for Unit 3 only. The licensee could not provide evidence that actions were taken to identify and remove the grounds in either unit.
- 3. On November 12, 1992, when a 125Vdc ground was present in Unit 3, the licensee failed to initiate actions to locate and remove the ground.

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

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, 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 Power 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 (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 20 day of VMWARY, 1993

T. O. Martin, Acting Director Division of Reactor Safety