

SEP 27 1993

DEP/DOCB  
(RIDS)

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

Commonwealth Edison Company  
ATTN: M. J. Wallace  
Vice President,  
Chief Nuclear Officer  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

Dear Mr. Wallace:

This refers to the inspection conducted by M. Leach, M. Peck, A. M. Stone, and J. F. Smith of this office, and by R. Zuffa of the Illinois Department of Nuclear Safety, on June 19 through August 16, 1993. The inspection included a review of activities authorized for your Dresden Nuclear Station, Units 2 and 3, facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report. Our findings were further clarified on August 26 during a discussion with Mr. G. Spedl.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Four violations were identified. The first violation was cited for inadequate control over station cleanliness and storage of equipment. This violation is of concern because each example was identified by the NRC within a ten-day period and demonstrated that management expectations have not been adequately communicated or reinforced to plant personnel. The second violation with numerous examples was cited for the failure to follow station procedures. This violation is of concern because each example was identified by the NRC and represents a negative trend in procedural adherence. There were previous violations cited for failure to follow procedures. In your response to the second violation, please describe your actions to reverse the negative trend and discuss the reasons that previous corrective actions were ineffective. The third violation was cited

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for the failure to take adequate corrective actions regarding a contaminated water leak in the 3B core spray pump room. The leak was identified in March; however, the leak was not contained until after it was identified by the NRC. A fourth violation, identified by the NRC, was cited for the failure to submit a licensee event report within 30 days. The additional management support to the event screening committee process should prevent recurrence. Although Section 2.201 requires you to submit to this office, within 30 days of your receipt of this Notice, a written statement of explanation, we note that this violation had been corrected and those actions were reviewed during this inspection. Therefore, no response with respect to the fourth violation is required.

Certain other of your activities appear to be in violation of NRC requirements. The non-cited violation described in paragraph 4.c of the enclosed inspection report involved misuse of work request prioritization. The issue was identified and investigated by your staff and was categorized as Severity Level IV. The criteria specified in Section VII.B of the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy, 10 CFR Part 2, Appendix C), were satisfied; therefore, a violation is not enclosed.

The majority of these violations were not identified by your quality assurance or self assessment activities. One of the violations regarding the failure to reconnect a power cable on an intermediate range monitor following a surveillance was previously identified by site quality verification; however, corrective actions were not effective.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

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The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely,

Original signed by E. G. Greenman

Edward G. Greenman, Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. Inspection Reports  
    No. 50-237/93020(DRP);  
    No. 50-249/93020(DRP)

cc w/enclosures:

M. Lyster, Site Vice President,  
G. Spedl, Station Manager  
J. Shields, Regulatory Assurance  
Supervisor  
D. Farrar, Nuclear Regulatory Services  
Manager  
OC/LFDCB  
Resident Inspectors, Dresden  
LaSalle, Quad Cities, Clinton  
R. Hubbard  
J. McCaffrey, Chief, Public  
Utilities Division  
R. Newmann, Office of Public  
Counsel, State of Illinois Center  
Licensing Project Manager, NRR  
State Liaison Officer  
Chairman, Illinois Commerce Commission  
J. B. Martin, RIII  
H. J. Miller, RIII  
T. O. Martin, RIII  
J. E. Dyer, NRR  
E. J. Leeds, NRR  
M. L. Jordan, RIII  
C. D. Pederson, RIII  
S. Stasek, SRI, Davis Besse

bcc: PUBLIC

RIII  
P2H  
Hiland  
9/14

RIII Bc  
Clayton  
9/29/93

RIII  
Ceh  
Hausman  
9/28/93

RIII  
Greenman  
9/29/93