Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

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September 17, 1993

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Notice of Violation and Inspection Report Concerns
Inspection Report 50-237/93022; 50-249/93022
NRC Docket Numbers 50-237 and 50-249

Reference: C. E. Norelius letter to L.O. DelGeorge, dated August 18, 1993, transmitting Inspection Report 50-237/93022; 50-249/93022.

Enclosed is Commonwealth Edison Company's (CECo) response to Notice of Violation 50-237(249)/93022-03 as requested in the referenced letter. CECo's responses to several concerns identified in the referenced inspection report are also provided as an attachment to this letter.

If your staff has any questions concerning this letter, please refer them to Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7285.

Sincerely,

D. Farrar
Nuclear Regulatory Services Manager

attachments

cc: J. B. Martin, Regional Administrator Region III
J. F. Stang, Project Manager, NRR
M. N. Leach, Senior Resident Inspector, Dresden

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ATTACHMENT 1
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-237/93022; 50-249/93022

VIOLATION: (237/93022-03; 249/93022-03)

Technical Specification 6.11.1 requires that procedures for personnel radiation protection be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Procedure DRP 1160-03, Revision 5, "RADIOLOGICAL SIGNS, LABELS, SIGNALS, AND CONTROLS," states that radioactive material tags and labels shall contain the maximum measured contact dose rate on the item or container.

Contrary to the above, on July 19, 1993, radioactive material labels on numerous bags in Bay 7 of the radwaste building barrelling area did not contain the maximum measured contact dose rate.

Reason for the Violation:

A review of this incident indicates that the procedures and training currently in place appropriately address labeling and storage practices. The reason for this incident is a failure of workers to meet the management expectation for procedural adherence. Lapses in these workers' performance are attributed to a perceived lack of accountability by the workers.

Corrective Steps Taken and Results Achieved:

Upon discovery of the unlabeled bags, Radiation Protection (RP) immediately performed dose rate surveys of all the unlabeled bags in the radwaste building barrelling area, labeled the bags appropriately, and documented the event on a Problem Identification Form. Tailgates were conducted for the RP personnel, Maintenance Contractors, and Station Laborers to highlight the event. The applicable procedural requirements were emphasized as well as management's expectation for procedural compliance. RP personnel were counseled further on the management expectation that they exhibit a questioning attitude towards all activities affecting station Radiation Protection performance and that they continually convey RP performance expectations to other departments.

Corrective Steps to Avoid Future Violation:

In addition to the immediate counseling of the Maintenance Contractors, Station Laborers and Radiation Protection departments, a station wide tailgate will be performed by September 29, 1993, re-emphasizing managements' expectations for procedural adherence.

The communication of RP-related management expectations and the employee follow-through on these expectations are areas that Dresden Station will continually strive to improve. While Dresden believes that recent enhancements to the RP program will be beneficial and have long-lasting results, it is too early in the implementation stage to evaluate the concrete results from these improvements. In addition, Management Involvement Guidelines are being developed with regard to first line supervisors, middle management, and senior management detailing expectations for communications and overview functions to aid in holding people accountable.

To further emphasize management expectations to Dresden station employees, a plant radiation walkaround program will be instituted by October 4, 1993. These RP walkarounds will include representatives from various working groups and various levels of management and bargaining unit personnel. The purpose of the RP walkarounds is to focus the attention of station personnel on RP work practices. By utilizing a multi-disciplined vertical cross-section of station personnel, two-way communications between RP and the various working departments will be strengthened, resulting in improved RP work practices. Furthermore, increased high-level management involvement on these walkarounds will ensure effective communication and re-enforcement of managements' expectations.

Dresden intends to continue these walkarounds through the Dresden Unit 3, Reload 13, refueling outage. Following this outage, Dresden will assess the effectiveness of the program and evaluate the continued necessity of the program.

The corrective actions from the previously identified inadequate labeling occurrences were focused mainly on procedural changes and training, while these proposed actions focus attention on communication of management expectations and employee follow-through on these expectations in order to hold personnel accountable. Within the program there will be mechanisms for the departments to notify each other of problems and focus the information at the Station Manager / Radiation Protection Manager meetings. This will ensure the proper levels of management are aware of the walkaround program results, and take the necessary actions to correct any deficiencies and reward the successes.

Date When Full Compliance Was Achieved:

Full compliance was achieved on July 21, 1993, following the placement of radioactive material labels on the subject bags.

ATTACHMENT 2
RESPONSE TO INSPECTION REPORT CONCERNS
NRC INSPECTION REPORT
50-237/93022; 50-249/93022

Inspector Concern No.1:

An increase in the scope of work late in the planning stages for the Unit 2 outage resulted in limited consideration of the exposure impact of the work. Additionally, planning and implementation problems occurred on several high dose jobs, such as the reactor water cleanup pipe replacement. Consequently, the actual outage exposure more than doubled the estimate of 600 person-rem (6 person-Sievert).

Dresden Station Response:

As identified in the July 12, 1993, Dresden Station RP Management Meeting, one of the stations's biggest exposure challenges is in the area of work control, including scheduling and estimating strategies. Following the recent Unit 2 outage, changes in the daily work control process were made to improve RP's role in the overall process. RP now participates in the decision making process for all jobs; RP helps determine whether the job should proceed and addresses radiological safety concerns early in the process via radiological information/instructions in work packages. For the upcoming Unit 3 Reload 13 outage, a detailed ALARA planning matrix has been developed to define due dates and departmental responsibilities for various RP planning activities to ensure successful planning is achieved. The matrix includes activities such as:

- temporary shielding approvals
- decision on chemical decontamination
- identification of work scope
- establishment of outage person-rem goal
- generation of radiation work permits and ALARA Action Reviews
- supplemental outage RP support
- establishment of an ALARA outage plan

Additionally, late additions to the outage will be reviewed for person-rem impact prior to inclusion in the outage scope.

Inspector Concern No. 2:

Non-outage daily doses are relatively high due to high dose rates in several general area walkways.

Dresden Station Response:

As identified in the July 12, 1993, Dresden Station RP Management Meeting, another one of the station's exposure challenges is source term reduction. While there have been several successes related to source term reduction in the general area walkways, the station has significant challenges remaining. Performance practices have been reviewed with technicians on occurrences where previous placement of shielding wasn't effective. One of the duties of the technician working in the Rad Waste area or any other area of the plant is to confirm proper shielding especially after source adjustment or removal. Current initiatives being undertaken to reduce general area dose rates include proceduralizing the hot spot program, enhancing the cobalt reduction program, performing hydrolazing of various lines, increase the use of shielding and component changeout.

In the area of cobalt reduction several of the initiatives underway or completed are as follows:

- Review the Piping and Instrument Diagrams (P&IDs) to determine the valves and components that are in direct contact with primary system water.
- Review the drawings and other reference information available to determine which valves contain cobalt.
- Identify the specific components by part number and drawing.
- Establish a replacement priority list.
- Contact vendors that provide cobalt containing valves and components. Review low cobalt replacement parts.
- Review availability of replacement parts.
- Long range replacement parts planning.

Inspector Concern No. 3:

Poor oversight of cleanup personnel during the outage and the lack of timely response to identified leaks resulted in numerous low-level contamination events.

Dresden Station Response:

This concern, as well as the identified need for contractor laborer training, are being reviewed for enhancements prior to the upcoming Unit 3 outage. During the past Unit 2 outage, a large contingency of contract laborers were brought on-site to perform cleaning and disposal activities with minimal laborer training. For the next refueling outage, Dresden intends to provide additional training to the contract laborers to ensure adequate knowledge and skills on appropriate decontamination methods and dry active waste transport and disposal. This training will be similar to the station laborer training. In addition, the station is working on improving the site organization so that one individual is responsible for coordinating the cleanup activities of all cleanup personnel.

In the area of leaks, various work groups are being trained/tailgated on observing their entire work area while in the plant, establishing immediate interim corrective actions, such as installation of catch basins, installing radiological barriers, etc., and following through by performing appropriate documentation to make final corrective action determination.

Inspector Concern No. 4:

Corrective actions for the mispositioning of the drywell temporary ventilation system were ineffective.

Dresden Station Response:

Prior to this event, the need for an administrative procedure to control the setup and operation of ventilation equipment was identified. Dresden Administrative Procedure (DAP) 12-32, "Operation and Use of Portable Air Filtration and Ventilation Equipment" is approved for use and should preclude drywell ventilation mispositionings in the future. Tailgate awareness sessions will be performed prior to the upcoming outage.