



**Commonwealth Edison**  
1400 Opus Place  
Downers Grove, Illinois 60515

November 05, 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; Inspection Report 50-237/93028; 50-249/93028  
NRC Docket Numbers 50-237 and 50-249

Reference: W. L. Axelson letter to L. O. DelGeorge, transmitting Inspection Report 50-237/93020; 50-249/93020.

Enclosed is Commonwealth Edison Company's (CECo) response to Notice of Violation 50-237(249)/93028 as requested in the referenced letter.

If your staff has any questions concerning this letter, please refer them to Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7250.

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

k:rpa:inspts:9230vr1.wpf:1

110028  
9311150063 931105  
PDR ADOCK 05000237  
Q PDR

IE06  
11

ATTACHMENT  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-237/93028; 50-249/93028

**VIOLATION:**

Dresden 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.

Contrary to the above, procedures for personnel radiation protection were not approved or maintained for controlling the placement of material or equipment on contaminated area boundaries, an operation involving personnel radiation exposure.

**REASON FOR VIOLATION:**

A review of this incident indicates that DAP 12-33, Control of Radioactive Material, delineates one of the employee responsibilities while working in the Radiologically Controlled Area to adhere to Radiation Protection instructions issued through training, procedures, verbal briefings, postings, labels and tags. A review of NGET training indicates that the issue of items crossing radiation boundaries and the associated requirements are addressed. The associated requirements should thus be adhered to. Although there is no direct statement regarding the specifics of requirements associated with materials crossing radiation boundaries in DAP 12-33, it is implied through reference to NGET training. This incident is attributed to a failure of workers to meet the management expectation for procedural adherence.

**CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:**

Upon discovery of the rags crossing the radiation boundary, Radiation Protection personnel immediately removed and surveyed the rags to ensure there was no spread of contamination. The event was discussed at a Radiation Protection daily meeting, as well as at the plan of the day meeting, to ensure quick dissemination of the violation information and the expectation of radiation workers with regard to the event.

ATTACHMENT  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-237/93020; 50-249/93020  
(Continued)

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:**

In order to ensure that workers understand expectations with regard to Radiation Protection policies and procedures, a letter addressing the expectations of all Dresden Station employees was distributed and discussed at a plan of the day meeting. Subsequently each department head, or designee, discussed the letter, expectations and accountability in their daily communication meeting. A Dresden Station policy will be written by November 30, 1993 to further ensure accountability with regard to Radiation Protection policies and procedures.

In addition to the immediate corrective actions and those identified above, DAP 12-33, Control of Radioactive Material, will be enhanced to specifically define the expectations for materials crossing radiation boundaries by December 03, 1993. The procedure revision, as well as the subject of the violation, will then be reconveyed to the station, via tailgate, by December 10, 1993.

Furthermore, in October of 1993, Radiation Protection Walkarounds were initiated to focus on Radiation Protection work practices and policies. One of the areas for review during the walkarounds, in the area of contamination control, is to verify that materials are not crossing radiological boundaries, without being properly secured.

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Compliance with regards to the rags identified in the Inspection Report was achieved on September 24, 1993, following removal and survey of same, and survey of the area where they were located.

The station policy and the approval of revision to DAP 12-33, which will be completed by December 03, 1993.