

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249
Licenses No. DPR-19; DPR-25

As a result of the inspection conducted from November 22 through December 3, 1993, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the violations are listed below:

1. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and which are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specified set of conditions.

Contrary to the above, on or around November 16, 1993, the licensee did not make surveys to assure compliance with 10 CFR 20.203(f)(1) which specifies warning labels for containers of licensed material. Specifically, 20 drums of contaminated liquid were not surveyed prior to release from the protected area as uncontaminated liquid; therefore, the containers of licensed material did not have warning labels.

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

2. 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.

Dresden Administrative Procedure, DAP 12-25, Revision 3, "Radiation Work Permit," states that personnel performing a job under a radiation work permit (RWP) will follow the requirements of the RWP and all associated documents.

Contrary to the above, the dosimetry requirements of several RWPs were not followed, as evidenced by the following examples:

- a. On November 30, 1993, three security personnel entered the main radiologically controlled area (RCA) without the required thermoluminescent dosimeters (TLDs).
- b. On December 2, 1993, a station laborer was working in the main RCA without the required TLD and electronic dosimeter.
- c. On December 3, 1993, a pipe fitter was observed in the main RCA without the required TLD.

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

Pursuant to the provisions of 10 CFR 2.201, Dresden Nuclear Station is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission Region III, 801 Warrenville Road, Lisle, Illinois,

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60532, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555, 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 Lisle, Illinois
this 27 day of December 1993.