

FEB 24 1994

Docket No. 50-249
License No. DPR-25
NOED No. 94-3-005

Commonwealth Edison Company
ATTN: Mr. M. Lyster
Site Vice President
Dresden Station
6500 North Dresden Road
Morris, IL 60450

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR COMMONWEALTH EDISON COMPANY
REGARDING THE DRESDEN NUCLEAR STATION, UNIT 3

Dear Mr. Lyster:

By letter dated February 22, 1994, you requested the U.S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the required actions associated with the inability to perform Technical Specification Surveillance Requirement 4.7.B.2.b(3) within the allowable time frame. Specifically, DIS 7500-01 "STANDBY GAS TREATMENT SYSTEM (SBGTS) AUTO-ACTUATION," which is required to be performed, at a minimum, every 18 months, will become overdue at 0817 hours on February 26, 1994. This date was calculated using the extension to the surveillance interval allowed by Technical Specification 1.0.CC based on the surveillance being last performed on Unit 3 at 0817 hours on April 10, 1992. Failure to perform Surveillance Requirement 4.7.B.2.b(3) within the specified time interval would require Unit 3 to be placed in a condition in which the SBGTS would not be required within 36 hours to comply with the Limiting Condition for Operation (LCO) action statement 3.7.B.1.b. Your staff provided as justification for continued operation that all auto-actuation input signals to the SBGTS have been demonstrated operable as required by routine surveillance activities; the Unit 3 SBGTS responded as required to the Group II isolation auto-initiation signal involving the loss of instrument air on January 16, 1993; and the three previous performances of DIS 7500-1 were successful.

In addition, you identified and will take compensatory measures including minimizing switchyard operations that may increase the probability of a Loss of Offsite Power and evolutions that may effect SBT operability must get prior approval from the Operating Engineer.

Based on our review of your justification for continued operation including compensatory measures identified above, we have concluded that plant safety will not be unduly compromised and we are satisfied that such action is in the interest of the public health and safety. Therefore, this letter documents our intention to exercise discretion not to enforce compliance with TS 4.7.B.2.b(3)

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FEB 24 1994

for the period from February 26, 1994, at 8:17 a.m. (CST) until March 12, 1994, at 9:00 p.m. (CST). Notwithstanding our granting of enforcement discretion, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

Original Signed By
T. G. Martin
 for Edward G. Greenman, Director
 Division of Reactor Projects

cc:

L. DelGeorge, Vice President, Nuclear
 Oversight & Regulatory Services
 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
 Licensing Project Manager, NRR
 State Liaison Officer
 Chairman, Illinois Commerce Commission
 W. L. Forney, RIII
 L. A. Reyes, Acting ADPR/NRR
 W. T. Russell, ADT/NRR
 J. W. Roe, DRPW/NRR
 J. A. Zwolinski, ADR3/NRR
 J. Lieberman, OE
 Technical Assistant, Division of Reactor
 Projects - I/II, NRR

bcc: PUBLIC - IE01

See Previous Concurrences - /ed

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Hiland	Clayton	Hausman	DeFayette	Zwolinski	<i>PM for</i> Greenman 2/24/94

for the period from February 26, 1994, at 8:17 a.m. (CST) until March 12, 1994, at 12:00 noon (CST). Notwithstanding our granting of enforcement discretion, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

Edward G. Greenman, Director
Division of Reactor Projects

cc:

L. DelGeorge, Vice President, Nuclear
Oversight & Regulatory Services
G. Spedl, Station Manager
J. Shields, Regulatory Assurance
Supervisor
D. Farrar, Nuclear Regulatory Services
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J. A. Zwolinski, ADR3/NRR
J. Lieberman, OE
Technical Assistant, Division of Reactor
Projects - I/II, NRR

bcc: PUBLIC - IE01

RIII

P2H
Hiland
2/24/94

RIII

BC
Clayton
2/24/94

RIII

Hausman
2/24/94

RIII

DeFayette
2/24/94

RIII

Zwolinski

RIII

GM for
Greenman
2/24/94