

Dec

July 2, 1997

Mr. J. S. Perry
Site Vice President
Dresden Station
Commonwealth Edison Company
6500 North Dresden Road
Morris, IL 60450

SUBJECT: NRC INSPECTION REPORT 50-237;249/97010(DRS) AND
NOTICE OF VIOLATION

Dear Mr. Perry:

On May 23, 1997, the NRC completed an inspection at your Dresden Generating Station, Units 2 and 3 facility. The enclosed report presents the results of this inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

Performance in the radiation protection area has continued to improve. During the refueling outage (D3R14) improved radiological controls, ALARA initiatives, and job planning were instrumental in reducing station dose. In addition, initiatives such as the "greeter" program were effective in improving radworker performance.

However, the NRC has determined that violations of NRC requirements occurred. These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The violations included: (1) the failure to provide individuals with an exit from a locked high radiation area; (2) the failure to appropriately evaluate a work activity which resulted in an intake of radioactive materials; and (3) the failure to follow the requirements of a training procedure. The violations are of concern because, in these cases, workers were unfamiliar with station requirements and radiological conditions, and were not provided with adequate station oversight. The second violation was attributed to poor communications between personnel, and is of particular concern since it should have been prevented by your corrective actions for a workers intake due to communications problems during the refueling outage in 1996.

The NRC has concluded that information regarding the reason for the third violation, the corrective actions taken and planned to correct the violation and prevent recurrence, is already adequately addressed in the subject inspection report. Therefore, you are not required to respond to the violation concerning failure to follow the requirements of a training procedure discussed in this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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However, you are required to respond to the other violations discussed in this letter and should follow the instruction specified in the enclosed Notice when preparing your response. In your response to the second violation, please describe why your corrective actions will be more successful in preventing future similar violations than those described in your letter dated November 13, 1996. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by John A. Grobe

John A. Grobe, Acting Director
Division of Reactor Safety

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

Enclosures: 1. Notice of Violation
2. Inspection Report 50-237/97010(DRS); 50-249/97010(DRS)

cc w/encls: T. J. Maiman, Senior Vice President, Nuclear Operations Division
D. A. Sager, Vice President, Generation Support
H. W. Keiser, Chief Nuclear Operating Officer
T. Nauman, Station Manager, Unit 1
M. Heffley, Station Manager, Units 2 and 3
F. Spangenberg, Regulatory Assurance Supervisor
I. Johnson, Acting Nuclear Regulatory Services Manager
Document Control Desk - Licensing
Richard Hubbard
Nathan Schloss, Economist, Office of the Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

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DRP w/encls	LPM, NRR w/encls	CAA1 w/encls
DRS w/encls	A. B. Beach, RIII w/encls	
RIII PRR w/encls	J. L. Caldwell, RIII w/encls	

DOCUMENT NAME: G:\DRS\DR97010.DRS (SEE PREVIOUS CONCURRENCE)

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NAME	Paul/jp	Shear	Kropp	Grobe
DATE	6/ /97	6/ /97	6/ /97	6/21/97

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However, you are required to respond to the other violations discussed in this letter and should follow the instruction specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

John Grobe, Acting Director
Division of Reactor Safety

Docket Nos. 50-237; 50-249

Enclosures: 1. Notice of Violation
2. Inspection Report Nos.
50-237/249-97010(DRS)
50-249/97010(DRS)

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D. A. Sager, Vice President, Generation Support
H. W. Keiser, Chief Nuclear Operating Officer
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OFFICE	RIII:DRS	RIII:DRS	RIII:DRP	RIII:DRS
NAME	Paul/jp	Shear	Kropp	Grobe
DATE	6/18/97	6/18/97	6/18/97	6/ /97

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NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

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

During an NRC inspection conducted from May 19-23, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 20.1601(d) requires that the licensee establish the access controls for high radiation areas in a way that does not prevent individuals from leaving the High Radiation Area.

Contrary to the above, on April 21, 1997, the licensee failed to provide individuals an exit from a Locked High Radiation Area in the anteroom of the Unit 2 drywell.

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

- B. 10 CFR 20.1501 requires each licensee make or cause to be made surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstance to evaluate the extent of radiation levels, concentrations or quantities of radioactive materials, and the potential radiological hazards that could be present.

Pursuant to 10 CFR 20.1003, survey means an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation.

Contrary to the above, as of April 21, 1997, the licensee did not make surveys to assure compliance with 10 CFR 20.1201(a)(i), which limits the total effective dose equivalent to 5 rems per year. Specifically, no evaluation was made to determine the radiological conditions before initiating a decontamination of highly contaminated areas in the Unit 2 torus basement.

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

- C. Technical Specification 6.2.A required, in part, that written procedures be established and implemented covering the activities referenced in Regulatory Guide (RG) 1.33, Appendix A. The activities listed in RG 1.33 include procedure adherence.

DAP 09-13, Revision 6, "Procedural Adherence," required, in part, that procedures be adhered to during the course of activities.

DAP 08-01, Revision 6, "Training Department Organization," stated, in part, that Training Department Instructions are procedures that govern the analysis, design, development, implementation, evaluation, and administration of training programs, and that training programs are to be implemented in accordance with approved Training Department Instructions.

Training Department Instruction-206, Revision 6, "Continuing Radiation Protection Technician Training" requires in part, that evaluations of task performance must be conducted in a consistent and objective manner in order to ensure that the required knowledge and skills have been acquired by the trainees.

Contrary to the above, (from October 1995 through January 1996) the initial training conducted for the operation of the PASSPORT Personal Alarm, did not include evaluations of trainee task performance as required by TDI-206.

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

For Violation Number 3, the NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent and prevent recurrence and the date when full compliance was achieved is already adequately addressed on the docket in Inspection Report Nos. 50-237/97010 and 50-249/97010. However, you are required to submit a written statement of explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

For Violation Nos. 1 and 2, pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting the 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 the Notice, an order may be issued to show cause 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, IL
this 2nd day of July 1997