

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

During an NRC inspection conducted on March 31, 1997, through May 14, 1997, and June 16, 1997, through July 8, 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:

1. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Dresden Administrative Procedure 02-27, "The Integrated Reporting Process," Revision 7, established measures to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified, classified and corrected.

NEP 10-03, "Disposition of Design Basis Discrepancies," Revision 0 (1/20/97), Step 5.2.1, requires that upon identification of a discrepancy between design documents, the updated final safety analysis report (UFSAR), or the physical plant, a problem identification form (PIF) is initiated.

Contrary to the above, as of April 3, 1997, the PIF process did not ensure that conditions adverse to quality were promptly identified and corrected. Specifically, 13 discrepancies regarding conditions adverse to quality for the 12 most risk significant systems were lost or misplaced. As a result, the 13 discrepancies were not entered or identified in the PIF tracking system.

This is a Severity Level IV violation (Supplement I).
VIO 50-237/249/97008-01(DRS)

2. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

DTI-DE-15, "Roles and Responsibilities of the Dresden Engineering Assurance Group," Revisions 0 and 1, stated that the Dresden Engineering Assurance Group (DEAG) will:

- a. perform surveillance trending to identify potentially degraded equipment as required by Section 2.6 (Revision 0).
- b. perform oversight of the Performance Improvement Report Process as it relates to the identification of potential operability issues as required by Section 2.8 (Revision 0).

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- c. follow DEAG reporting requirements as required by Sections 5.3 (Revision 0)/Section 5.4 (Revision 1).
- d. appropriately grade all activities reviewed on the DEAG Review Sheets as required by Sections 5.2 and 5.3 (Revision 1).

Contrary to the above, from November 18, 1996, through April 14, 1997, for items a. through c., and from February 25, 1997, through April 14, 1997, for item d., the DEAG failed to accomplish prescribed activities affecting quality in accordance with DEAG Instruction DTI-DE-15.

This is a Severity Level IV violation (Supplement I).
VIO 50-237/249-97008-02(DRS)

For Violation Number 2, the NRC has concluded that information regarding the reason for the violation, the corrective steps that have been taken and the results achieved, the corrective steps that will be taken to avoid further violations, and the date when full compliance was achieved is already adequately addressed on the docket in Inspection Report 50-237/249-97008(DRS). 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 of Violation (Notice), within 30 days of the date of the letter transmitting this Notice.

For Violation Number 1, pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement of 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 this 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

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, Illinois
this 25 day of September 1997