

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dresden Road  
Morris, IL 60450  
Tel 815-942-2920



January 12, 1998

JMHLTR: #98-0006

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: Dresden Nuclear Power Station Units 1, 2 and 3  
Reply to a Notice of Violation; Inspection Report 50-249/97027.  
NRC Docket Numbers 50-249

Reference: J. Grobe letter to J. S. Perry, dated December 5, 1997, transmitting NRC  
Inspection Report 50-249/97027 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted by the above reference. The violations resulted from the failure to retrieve a radiograph, a quality record, which was produced during the Unit 3 Inservice Inspection.

The attachment contains the following commitment:

- Control deficiencies in Central Files associated Corrective Action Report (CAR) 12-97-066 are being tracked by NTS items scheduled for completion on June 30, 1998.

In as much as the radiograph has been retrieved and is on file, and our investigation concluded this is an isolated incident, it is requested that the Notice of Violation be rescinded.

The Station's request for an extension of time for responding to the Notice of Violation was granted by NRC Management on December 12, 1997 during a telephone conversation between Mr. J. Gavula (NRC) and Gary Abrell (ComEd - Dresden).

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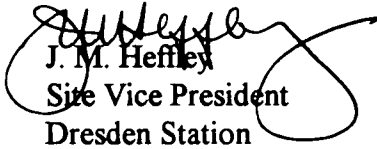


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This response contains no proprietary or safeguards information. If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920 extension 3800.

Sincerely,

  
J. M. Hefley  
Site Vice President  
Dresden Station

Attachment

cc: A. Bill Beach, Regional Administrator, Region III  
M. Ring, Branch Chief, Division of Reactor Projects, Region III  
J. F. Stang, Project Manager, NRR (Unit 2/3)  
K. Riemer, Senior Resident Inspector, Dresden  
Office of Nuclear Facility Safety - IDNS

**ATTACHMENT**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-249/97027**

**VIOLATION:**

10 CFR 50, Appendix B, Criterion XVII requires, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality and that the records shall be identifiable and retrievable.

Contrary to the above, on November 6, 1997, the inspector identified that the licensee had failed to furnish evidence of activities affecting quality, in that, the licensee was unable to retrieve the record of radiography performed May 16, 1997, of a Unit 3 High Pressure Coolant Injection pipe weld, FW-3, under work request 950065745.

**REASON FOR VIOLATION:**

On 11/06/97, during an NRC Inspection of Inservice Examination reports and Inservice Inspection (ISI) personnel certifications as recorded in the D3R14 ISI Summary Report, the NRC inspector requested to see modification (minor plant change E12-3-95-246) Work Request 950065745 which contained radiography. The work request was located, but the radiograph could not found.

A search for the radiograph was performed from 11/06/97 through 11/10/97. The station was unable to locate the radiograph in Quality Control, on any transmittal from QC to Central Files, or within the Central Files Vault. QC did have a copy of the Radiography Reader Sheet, which was fully approved. On 11/10/97, a Problem Identification Form (PIF) No. D1997-08032 was initiated.

Subsequent to the completion of the PIF corrective actions, the radiograph was located in a Central Files hold file on 12/22/97. The transmittal sheet was missing the Document Type code which identifies the item's storage location in the vault.

**CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:**

The PIF was screened as a Nonconformance (NCR), and an Apparent Cause Evaluation (ACE) was initiated to determine the cause of the lost record. The ACE was completed on 12/19/97.

For the NCR, QC verified all D3R14 radiographs on were on file as indicated by the Nondestructive Examination (NDE) Log. The verification, filed with the NTS, indicates that this was the only radiograph not properly filed in Central Files. The NCR was resolved as Use-As-Is based upon having the approved Reader Sheet and the verification that this was an isolated occurrence. It was approved by the Engineering Manager and accepted by the Authorized Nuclear Inservice Inspector (ANII) on 12/17/97.

The ACE identified that a Quality Control Instruction (QCI) No. 24 did not adequately address what was to happen to the original Reader Sheet and the associated film. NTS No. 249-212-97-23601A was established to track revision to the QCI, due 12/19/97.

The Central File Supervisor reviewed her Department's involvement in the retrieval of the radiograph. Central Files identified this as similar to control deficiencies previously identified by PIF D1997-06612 and associated Corrective Action Report (CAR) 12-97-066. Corrective actions for the CAR are being tracked by NTS items assigned to Central Files.

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

The Quality Control QCI was revised on 12/19/97.

Central File Corrective Actions in response to the CAR are on schedule with a planned completion of the all items on 6/30/98. Completion of the committed Corrective Actions to the CAR will ensure measures are in place to avoid further violation.

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

Final corrective actions are scheduled to be completed on 6/30/98. The Radiograph was recovered and is properly stored in Central Files.