

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station

Docket Numbers 50-237; 50-249
License Numbers DPR-19; DPR-25
EA 97-266

During an NRC investigation that was completed on May 30, 1997, a violation of NRC requirements was identified. In accordance with the NUREG-1600, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violation is listed below:

10 CFR 50.9 (a), "Completeness and accuracy of information" requires, in part, that information provided to the Commission by a licensee shall be complete and accurate in all material respects.

Contrary to the above, the attachment to a March 4, 1996, letter from the Dresden Site Vice President to the NRC, was not complete and accurate in all material respects. Specifically, the attachment stated, "In Unit 3 the connections are conventional clip angle connections (i.e., the beams are located within the boundary of the embedded plates)." This statement was not accurate in that the Unit 3 connections were not all clip angle type connections. The statement was material because the information related to the operability of safety related components.

This is a Severity Level IV violation (Supplement VII.D.1).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken, and plans to correct the violation and prevent recurrence, and the date when full compliance was achieved is adequately addressed on the docket by ComEd's April 4, 1996, letter and by this letter and its enclosures. However, you are required to submit a written statement or 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 subject of this Notice of Violation (Notice), within 30 days of the date of the letter transmitting this Notice.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding

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confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 27th day of January 1998



DRESDEN STATION

Dresden Station
Predecisional Enforcement
Conference

October 28, 1997

ComEd *Presenters - Dresden Station*

DRESDEN STATION

- J. Stephen Perry, Site Vice President
- Russell D. Freeman, Station Engineering Manager
- Timothy L. Loch, Modification Design Group



DRESDEN STATION

Introduction - J.S. Perry

- ComEd accepts responsibility for completeness and accuracy
- Partially inaccurate information was provided in March 4, 1996 letter
 - Conclusions of letter were accurate
 - Error was not intentional



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Facts

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- ComEd submitted letter of March 4, 1996 in response to NRC requests
 - Addressed acceptability of Unit 2 startup
 - Provided quantitative data on operability determination for corner room steel

Facts

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- Attachment described why Unit 2 Southwest corner room was most limiting for Operability Evaluation
 - As part of reasons, stated:
 - “In Unit 3 the connections are conventional clip angle connections (i.e., the beams are located within the boundary of the embedded plates).”

Facts

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- Description of beams is partially inaccurate
 - One of three main beams in each of the two Unit 3 corner rooms is partly offset from plate
 - Error did not change conclusion that Unit 2 steel is most limiting
 - Not intentional -- considered accurate based on input from engineers and A/E



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Facts

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- Error identified by NRC inspector
 - ComEd promptly corrected by superseding letter dated April 4, 1996



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Root Causes

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- Inattention to detail
 - Failure to validate that letter was correct in advance of submittal

Conclusions

- The error was not material
 - Operability remained valid
 - Unit 2 SW corner room remained most limiting
- Overall, the letter was accurate for stated purpose

Significance

- Error did not affect operability decision
- No safety significance
 - Corner room steel issue did not pose risk to public health and safety



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Actions Taken

- Individuals counseled / reprimanded
- Engineering Department briefed on lessons of event
- Programmatic changes to prevent recurrence
 - New Guidelines established for preparation of regulatory correspondence
 - Engineering Assurance Group



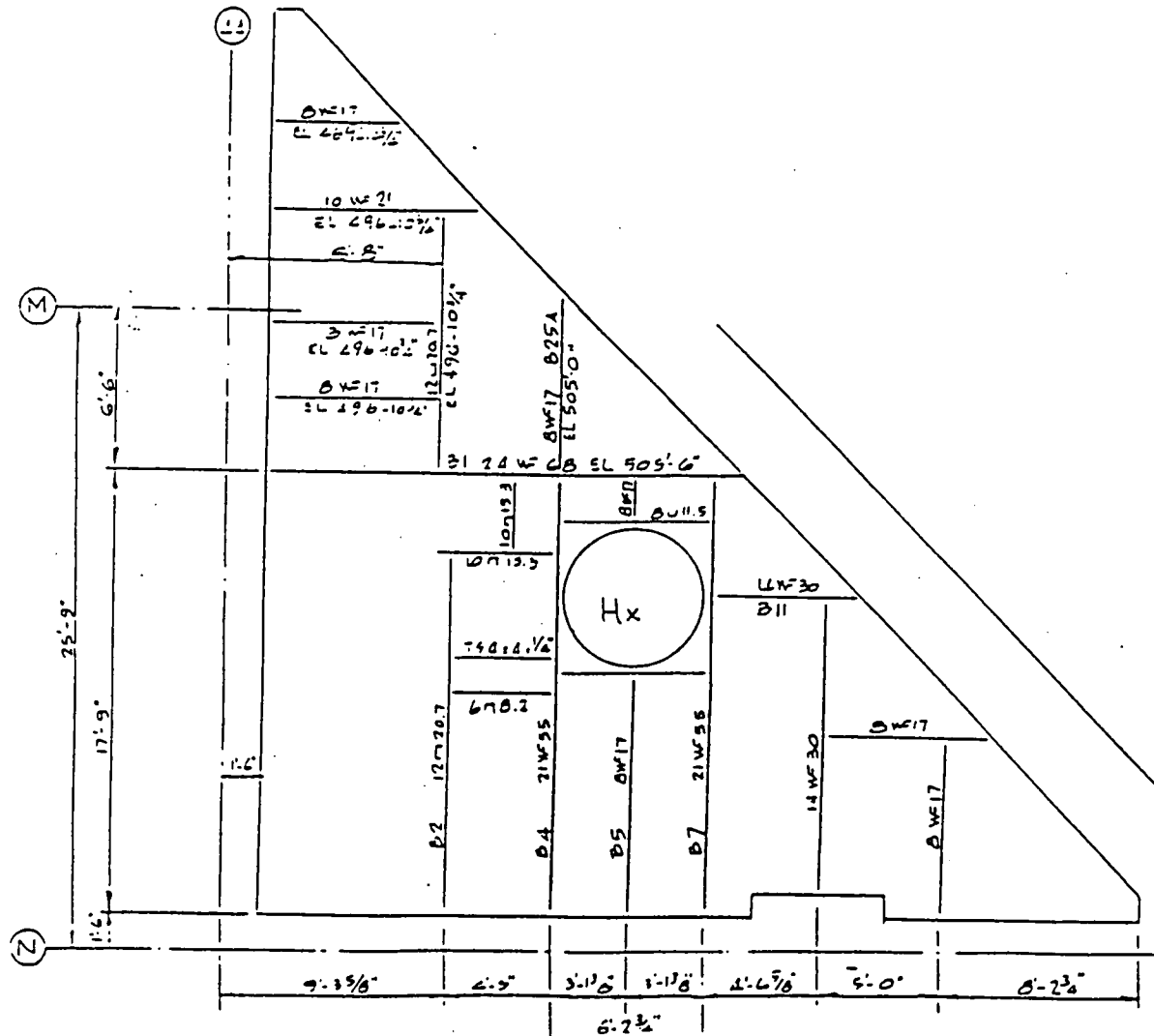
DRESDEN STATION

Closing Remarks

- 10 CFR 50.9: “Information provided . . . shall be complete and accurate in all material respects.”
- ComEd understands our responsibility to provide the NRC with correct and reliable information

Dresden Station - Unit 2

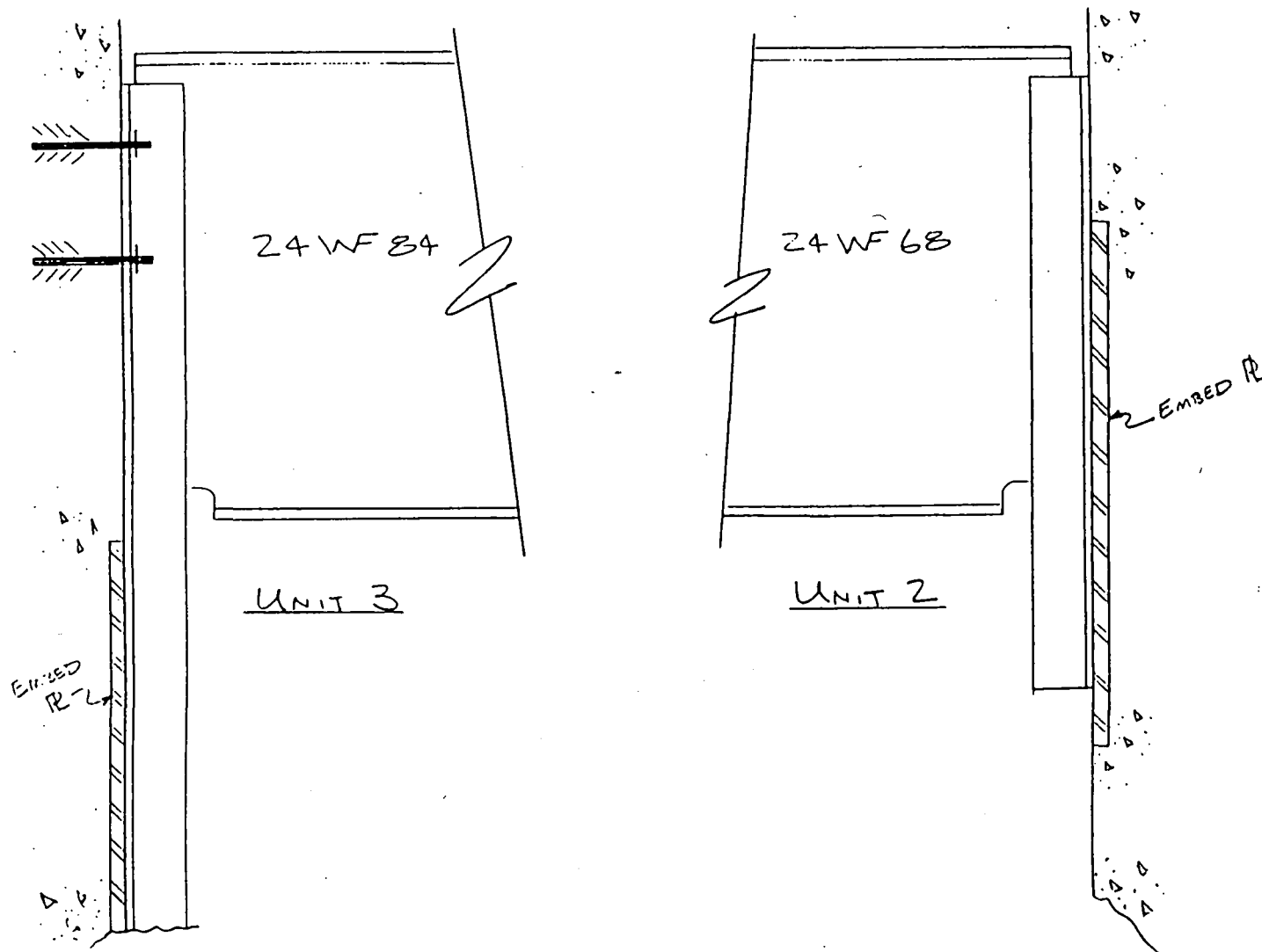
Southwest Corner Room



ComEd

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Connection Eccentricity Comparison



Enclosure 3

The apparent violation discussed at the predecisional enforcement conference is subject to further review and is subject to change prior to any resulting enforcement action

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Enclosure 4

**Meeting Participants
Dresden Closed Predecisional Enforcement Conference
October 28, 1997**

Commonwealth Edison

S. Perry
R. Freeman
F. Spangenberg
T. Loch
D. Stenger
B. Helfrich
D. Farrar
B. Rybak
S. Reece-Koenig

Nuclear Regulatory Commission

A. B. Beach
J. Jacobson
G. Grant
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R. Landsman
B. Clayton
B. Berson