

## NOTICE OF VIOLATION

Commonwealth Edison Company  
Dresden Nuclear Power Station, Units 2 and 3

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

During an NRC inspection conducted on November 23, 1997, to January 12, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. Dresden Technical Specification 6.8.A required that written procedures be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Appendix A of RG 1.33 recommended administrative procedures.

Nuclear Station Work Procedure (NSWP) A-15, "ComEd Nuclear Division Integrated Reporting Program," Rev. 1, Step 6.9.1.7, required that the program coordinator send feedback forms to the originators of problem identification forms (PIFs).

Contrary to the above, as of December 2, 1997, the licensee had failed to generate feedback forms to PIF originators as specified in NSWP-A-15.

This is a Severity Level IV violation (Supplement I). (50-237/97028-01; 50-249/97028-01)

2. Dresden Technical Specification 6.8.A. required that written procedures be implemented covering the activities recommended in Appendix A of RG 1.33, Revision 2, February 1978. The guide recommended administrative procedures.

Dresden Administrative Procedure (DAP) 09-13, "Procedural Adherence," Rev. 06, required continuous use of a Category 1 procedure.

Contrary to the above, on December 13, 1997, licensee personnel performed work without continuously using the appropriate Category 1 procedure, DES 8300-17, "Unit 2(3) Quarterly Station Battery Inspection," Rev. 06, and manipulated components not specified in the procedure.

This is a Severity Level IV violation (Supplement I). (50-237/97028-02; 50-249/97028-02)

3. Dresden Technical Specification 6.8.A required that written procedures be implemented covering the applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978. The guide recommended administrative procedures.

Dresden Administrative Procedure (DAP) 03-07, "Control of the service air and domestic water systems and hoses for general station use," Rev. 09, Step F.3.e., stated "IF a RED, WHITE, OR CLEAR hose must cross the boundary between a contaminated area AND a non-contaminated area, THEN the hose must be secured at the boundary using Radioactive Materials Tape."

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Contrary to the above, on December 19, 1997, a white hose that crossed the boundary between a contaminated area and a non-contaminated area (a step-off pad in the Unit 2 east torus basement area) was not secured at the contamination boundary.

This is a Severity Level IV violation (Supplement IV) (50-237/97028-03, 50-249/97028-03).

For the first violation, failure to implement the requirements of NSWP-A-15, the NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved are already adequately addressed on the docket in Inspection Report No. 50-237/97028; 50-249/97028 enclosed with this Notice of Violation (Notice). 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 the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation.

For the violations of DAPs 09-13 and 03-07, pursuant to the provisions of 10 CFR 2.201, ComEd 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 this Notice of Violation. 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.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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 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 6th day of January 1998