

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 January 12 through February 20, 1998, four 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. Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50 required that activities affecting quality be prescribed by instructions appropriate to the circumstances and be accomplished in accordance with those instructions.
 - a. Contrary to the above, on January 13, 1998, Dresden Instrument Surveillance Procedure 0263-14 for Yarway level indicator calibration, an activity affecting quality, was not appropriate for the circumstances of performing the calibration at power because the procedure did not bypass the trip functions. As a consequence of the inadequate surveillance procedure, an automatic reactor scram occurred on January 13, 1998, during the performance of the calibration surveillance.

This was a Severity Level IV violation (Supplement I).
 - b. Contrary to the above, the instructions (WR # 970070793) used on February 4, 1998, to perform maintenance, an activity affecting quality, on safety-related motor control center (MCC) 28-1 were not appropriate because the instructions specified the installation of an incorrect coil for the 2/3 emergency diesel generator fan.

This was a Severity Level IV violation (Supplement I).
 - c. Contrary to the above, the work instructions (WR # 960044491) used on February 5, 1998, for maintenance of the emergency diesel generator, an activity affecting quality, were inadequate because the proper direction for pump rotation was not checked. This led to the turbo lube oil pump for the 2/3 emergency diesel generator being run backward for several hours.

This was a Severity Level IV violation (Supplement I).
 - d. Contrary to the above, the erection of scaffolding, an activity which could affect quality, was not accomplished per Dresden Maintenance Procedure (DMP) 0018-08, Revision 03, because on January 12, 1998, scaffolding was discovered in direct contact with containment cooling service water system Valve 2-1599-82C, a piece of safety-related equipment. Attachment D of DMP 0018-08 contained horizontal and vertical clearance requirements between scaffolding and safety-related equipment.

This was a Severity Level IV violation (Supplement I).

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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, DC 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). 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 or severity level, (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 21 day of March 1998