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April 10, 1998

JMHLTR: #98-0101

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

Subject: Dresden Nuclear Power Station Units 2 and 3  
Inspection Report 50-010; 237; 249/97010  
NRC Docket Numbers 50-010, 50-237, and 50-249

- References: (1) J. S. Perry letter (JSPLTR-97-0144) dated July 31, 1997, Response to NRC Inspection Report 50-010; 237; 249/97010 and Notice of Violation.
- (2) Regulatory Guide 8.38, *Control of Access to High and Very High Radiation Areas in Nuclear Power Plants*.

The purpose of this letter is to notify you of a planned change to a commitment made in Reference (1).

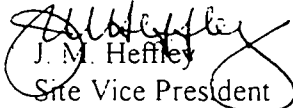
Specifically, the Response to Notice of Violation 50-237;249/97010-01 section entitled, "Corrective Steps Taken to Avoid Further Violation" describes a procedure change to Dresden Administrative Procedure (DAP) 12-04, "Control of Access to High Radiation Areas". The original corrective action in Reference (1) describes a revision to DAP 12-04 which requires that a log shall be used to track each entry/exit of individuals for *all* Locked High Radiation Area/Very High Radiation Area (LHRA/VHRA) entries. The revised wording will require a log to track each entry/exit of individuals for LHRA/VHRA entries to maintain accountability of personnel in areas in which the door locking mechanism would prevent free, unobstructed egress from the area (i.e., padlock on the door). This change is consistent with the guidance annotated in Reference (2). Specifically, Section 1.5 (last paragraph) discusses that controls must be established that prevent personnel from being locked in a High Radiation Area. For example, if chains and padlocks are used, procedural controls must prevent the area from being locked with personnel in the area. The above planned change to DAP 12-04 (NTS # 237-200-97-03206A due May 31, 1998) will provide the necessary procedural control that would prevent the area from being locked with personnel in the area. This change does not reduce the effectiveness of the corrective action to prevent locking personnel in a High Radiation Area.

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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. Heffley  
Site Vice President  
Dresden Station

cc: A. Bill Beach, Regional Administrator, Region III  
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