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June 25, 1998

JMHLTR: #98-0180

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

Subject: Dresden Nuclear Power Station Units 2 and 3  
Reply to a Notice of Violation, Inspection Report 50-237/249/98016  
NRC Docket Numbers 50-237 and 50-249

Reference: (a) J. A. Grobe letter to O. D. Kingsley, dated May 26, 1998, transmitting  
NRC Inspection Report 50-237/249/98016 and Notice of Violation

The purpose of this letter is to provide ComEd's reply to the Notice of Violation transmitted by reference (a). The violation concerned the failure to perform adequate evaluation of the airborne radioactivity concentrations during the tensioning of the Unit 2 drywell cover on April 11, 1998. The response to the Notice of Violation appears in the attachment.

Dresden is committing to the following action:

A Training Revision Request was written to evaluate if Radiation Protection Technicians (RPTs) need additional training on air sample techniques when providing job coverage. If the needs analysis indicates training, then training will be performed prior to D3R15. (NTS 237-100-98-0160201A)

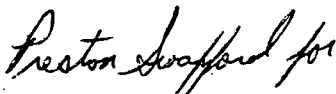
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This response contains no proprietary or safeguards information. If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920 extension 3800.

Sincerely,



J. M. Heffley  
Site Vice President  
Dresden Station

Attachment

cc: Regional Administrator, Region III  
M. Ring, Branch Chief, Division of Reactor Projects, Region III  
L. Rossbach, Project Manager, NRR (Unit 2/3)  
K. Riemer, Senior Resident Inspector, Dresden  
Office of Nuclear Facility Safety - IDNS  
File: Numerical

**ATTACHMENT 1**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-237/98016, 50-249/98016**  
**98016-02**

**VIOLATION:**

10 CFR 20.1501 requires that each licensee make or cause to be made, surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive materials, and the potential radiological hazards that could be present.

Pursuant to 10 CFR 20.1003, survey means an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation.

Contrary to the above, on April 11, 1998, an adequate survey was not made to assure compliance with 10 CFR 20.1201(a)(1)(i), which limits the total effective dose equivalent to 5 rems per year. Specifically, there was a failure to adequately evaluate the airborne radioactivity concentrations of the work environment during tensioning of the Unit 2 drywell cover.

**REASON FOR VIOLATION:**

This violation occurred because the standard for pulling a representative air sample outlined in DRP 6020-02, an established procedure, was not met. Specifically, the air sampler was placed at a stationary location while the workers moved around the circumference of the cavity. Additionally, the air samples were collected for approximately 22 and 7 hours, respectively, while the work was complete in about two hours. Therefore, the air samples were not representative of the work environment during the job evolution. Additionally, there was a lack of Radiation Protection Management oversight to ensure that the established standards were met.

**CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED:**

In vivo bioassays were performed on the two personnel who were performing the work. The results of these bioassays demonstrated that the total effective dose equivalent was significantly less than the limit of 5-rems per year in 10 CFR 20.1201(a)(1)(i). These individuals received calculated committed effective dose equivalent (CEDE) of 2 mrem and 67 mrem, respectively. Follow-up radiological surveys and an air sample were taken of the area.

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

Additionally, a Training Revision Request (TRR # 98-836) was written to evaluate if Radiation Protection Technicians (RPTs) need additional training on air sample techniques when providing job coverage (complete). If the needs analysis indicates training, then training will be performed prior to D3R15. (NTS 237-100-98-0160201A)

The Radiation Protection Department has implemented a scorecard policy for performing job observations. The scorecard policy requires job observations by Radiation Protection Supervisors to increase oversight and improve human performance.

The RPT providing radiological job coverage during this evolution has been coached on air sampling standards and expectations as a result of this event.

The management and technician team was coached on the expectations for appropriate air sampling. The details of this coaching are documented by the Radiation Protection Manger in RP Memo 98-042.

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

Full compliance was achieved on April 11, 1998, when the area was surveyed and the bioassays were performed.