

July 8, 1998

EA 98-306

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-237/98007(DRS);
50-249/98007(DRS))

Dear Mr. Kingsley:

This will acknowledge receipt of your letter dated May 14, 1998, in response to our letter dated April 14, 1998, transmitting a Notice of Violation associated with Inspection Report 50-237/98007(DRS); 50-249/98007(DRS). In your response, you denied that the violation, involving a failure by your procedures to designate measuring and test equipment (M&TE) calibration records as quality assurance (QA) records and to retain those records for at least five years, was a violation of NRC requirements. On May 28, 1998, your staff faxed documentation to our office that your staff had not provided during the inspection or at the exit meeting. This documentation demonstrated that the legal requirement for the Dresden Station at the time of the violation was ANSI/ASME NQA-1-1989 (Revisions 1a, 1b), "Quality Assurance Program Requirements for Nuclear Facilities," and not the documents cited in the violation. We have reviewed the documentation and agree that NQA-1-1989 was the legal requirement for M&TE calibration records at the time of the violation. We are, therefore, rescinding the violation. Our review has determined that NQA-1-1989, Section II, Section 17, also required that M&TE records be specified as QA records; however, since the classification has been changed to QA and the records had been adequately retained even when designated as non-QA records, this failure constituted a violation of minor significance and is not subject to formal enforcement action.

Sincerely,

Original /s/ J. L. Caldwell
James L. Caldwell
Deputy Regional Administrator

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

Enclosure: Ltr dtd 5/14/98 from J. Heffley,
ComEd to USNRC

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Sincerely,

John A. Grobe, Director
Division of Reactor Safety

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

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*06 concurrence per
5A 98-306
JHG 7/6/98*

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