

NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Station, Units 2 and 3

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

During an NRC inspection conducted July 14 through August 25, 1998, 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. Dresden Technical Specification 3.8.D, states, in part, that when in OPERATIONAL MODE "*", with the control room emergency filtration system or the refrigeration control unit (RCU) inoperable, immediately suspend handling of irradiated fuel in the secondary containment.

Contrary to the above, on August 21, 1998, while in operational mode "*", licensee fuel handling personnel moved a damaged fuel bundle (irradiated fuel) in the secondary containment while the RCU was inoperable.

This is a Severity Level IV violation (Supplement 1). (VIO 50-237/249-98021-02(DRP))

2. Dresden Technical Specification 6.8.A.1 states that written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix A of RG 1.33, Revision 2, February 1978. Appendix A of RG 1.33 states, in part, that procedures for surveillance and calibration tests (Section 8.b) are typical safety-related activities that should be covered by procedures.

Step 6.a.3 of Dresden Instrument Surveillance (DIS) 500-06, "Condenser Low Vacuum Pressure Switch Channel Calibration and Channel Function Checks" (a procedure required by RG 1.33) required that leads from the reactor protection system (RPS) test box be landed on relay post 2 and 4 for relay 590-101A.

Contrary to the above, on July 31, 1998, while performing DIS 500-06, licensee personnel failed to install RPS test box leads to relay 590-101A, but instead installed the test lead to relay 590-107C. This action resulted in the receipt of an unexpected half-scam in the main control room and disabled the input from average power range monitor channel 3 to the reactor protection system.

This is a Severity Level IV violation (Supplement 1) (VIO 50-237/249-98021-03(DRP)).

For Violation 2, 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 is already adequately addressed on the docket in publicly available correspondence and in the enclosed inspection report. Therefore, you are not required to respond to this NOV unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified below.

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For Violation 1, pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company 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 (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, D.C. 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 a 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 24th day of September 1998