

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 on July 28, 1998 through August 28, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Dresden Administrative Procedure (DAP) 7-52, "Control of Equipment Draining," Revision 0, Section G.5.b.(5) provided guidance for controlling the draining and water sampling process during testing of the reactor building fire suppression system.

Contrary to the above, on August 28, 1998, adequate directions for performing the water sampling process was not contained in DAP 7-52. Specifically, the location for collecting and sampling the reactor building fire suppression system water during testing was not adequate. As a result, management's interpretation and direction for the sampling process did not agree with the staff's interpretation of the DAP 7-52 procedure.

This is a Severity Level IV violation (Supplement 1).

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, and the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report No. 50-237/249/98022(DRS). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it 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).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be placed in the NRC Public Document Room (PDR). Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Dated this 4th day of December 1998

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