



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

August 27, 1981

Mr. James G. Keppler, Director
 Directorate of Inspection and
 Enforcement - Region III
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, IL 60137

IE HQ FILE COPY

Subject: Dresden Station Units 1, 2 and 3
 Response to I.E. Inspection Report
 Nos. 50-010/81-08, 50-237/81-17,
 and 50-249/81-12
NRC Docket Nos: 50-010/237/249

Reference (a): R. F. Heishman letter to Cordell Reed
 dated July 30, 1981.

Dear Mr. Keppler:

Reference (a) indicated that certain of our Dresden Station activities appeared to be in non-compliance with NRC requirements and requested a response within thirty (30) days.

The enclosure to this letter provides the Commonwealth Edison Company response to this matter. This apparent item of non-compliance was raised during the routine safety inspection conducted by Messrs. T. M. Tongue and M. J. Jordan of your office during the period of June 6 through July 2, 1981, at our Dresden Station.

To the best of my knowledge and belief, the statements contained herein and in the enclosure are true and correct. In some respects, these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any further questions that you may have concerning this matter to this office.

Very truly yours,

L. O. DelGeorge
 Director of Nuclear Licensing

Enclosure
 cc: Region III Inspector - Dresden

SUBSCRIBED AND SWORN to
 before me this 27th day
 of August, 1981.

Notary Public

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

DRESDEN STATION UNITS 1, 2 and 3

RESPONSE TO NOTICE OF VIOLATION

The apparent item of non-compliance identified in Appendix A of the Reference (a) letter is presented here and responded to in the following paragraphs:

Technical Specification 3.7.A.1 requires that the suppression pool water volume be maintained between the maximum of 115,655 cubic feet (minus 1.5 inches indicated) down to a minimum of 112,000 cubic feet (minus 5.0 inches indicated). This is also a precaution and limit in the HPCI Test Procedure DOS 2300-6 and the ADS Test Procedure DOS 250-5.

Contrary to the above, on May 11, 1981, while testing HPCI and ADS systems on Unit 2, the suppression pool (TORUS) level was allowed to rise to 1.5 inches indicated. This is 3.0 inches in excess of the allowable level.

1) CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

The HPCI turbine was secured and the excess suppression pool water was pumped to the hotwell. The suppression pool level was reduced to less than the LCO limit within two hours upon discovery.

2) CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER NON-COMPLIANCE

Two actions will be taken to avoid further non-compliance:

- A) A revision to the Dresden Station Technical Specifications will be submitted to add a time period for returning the suppression pool water volume to within LCO Specifications if exceeded, and the subsequent action if it cannot.
- B) A review of the specific Technical Specification suppression pool water volume LCO limits will be conducted during the weekly operator retraining sessions. Emphasis will be placed on the importance of adhering to the Technical Specification limits and the specific precautions that are highlighted in the HPCI and ADS test procedures. Specific operator attention to the suppression pool water level during these test periods will also be highlighted. Also, the fact that this is a recurring event will be emphasized.

ENCLOSURE

- 2 -

Consideration was given to changing the suppression pool water level alarm setpoints. However for both the wide and narrow range suppression pool water level instruments, the high and low level alarm points are set one inch from the Technical Specification LCO limits. Because this alarm setting provides sufficient time for operator action to prevent exceeding the limit, no change was deemed necessary. We believe that the operator retraining mentioned above is the only reasonable action that can be taken until such time as the Technical Specification change is in place.

3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The target completion date for both the Technical Specification revision submittal and operator retraining is November 2, 1981.

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