



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

September 24, 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

Subject: Dresden Station Units 2 and 3  
Quad Cities Station Units 1 and 2  
Response to NRC Inspection Report  
No. 50-237/81-21; 50-249/81-15;  
50-254/81-16; and 50-265/81-16  
NRC Docket Nos. 50-237/249 and  
50-254/265

Reference (a) C. E. Norelius letter to Cordell Reed  
dated August 24, 1981.

Dear Mr. Keppler:

Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements and requested a written response within thirty (30) days.

The enclosure to this letter provides the Commonwealth Edison Company's final response to this matter. The apparent item of noncompliance was raised during the special safety inspection conducted by Mr. I. T. Yin of your office on July 8 and 9, 1981, at the EDS Nuclear Inc. facilities in San Francisco, concerning activities that pertain to our Dresden and Quad Cities Stations.

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 and consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

8110140212 811008  
PDR ADDCK 05000237  
G PDR

SEP 29 1981


J. G. Keppler

- 2 -

September 24, 1981

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

cc: Region III Inspector - Dresden  
Region III Inspector - Quad Cities

lm

SUBSCRIBED AND SWORN to  
before me this 25th day  
of September, 1981.

  
Notary Public

2580N

ENCLOSURE

COMMONWEALTH EDISON COMPANY

DRESDEN STATION UNITS 2 and 3

QUAD CITIES STATION UNITS 1 and 2

RESPONSE TO NOTICE OF VIOLATION

The apparent item of noncompliance identified in Appendix A of Reference (a) is presented here and responded to in the following paragraphs pursuant to the provisions of 10 CFR 2.201.

As a result of the inspection conducted on July 6-9, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980,), the following violation was identified.

10 CFR 50, Appendix B, Criterion VI, states, in part, that "Measures shall be established to control the issuance of documents.....including the changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed.....and approved.....by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 9, dated July 16, 1979, states in Section 6, that "A document control system will be used to assure that documents such as specifications, procedures, and drawings are reviewed for adequacy and approved for release by authorized personnel. Such documents will be distributed to and used at the locations where the prescribed activity is performed. Changes to these documents will be handled similarly and will be reviewed and approved by the same organization that performed the original review and approval, unless delegated by the originating organization to another responsible organization."

Contrary to the above, procedures had not been revised to reflect the operability criteria for the evaluation of the installed suspension system components. In addition, there were conflicting requirements within the procedures.

This is a Severity Level V violation (Supplement II).

Enclosure

- 2 -

1) CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

As documented in the EDS Nuclear Inc. letter to the Commonwealth Edison Company dated September 16, 1981, EDS Nuclear has revised the Project Instructions (PI's) to clearly present all current criteria. All comments made by the NRC inspectors have been incorporated in these revisions. There is no impact on completed or current EDS activities due to these revisions.

2) CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Commonwealth Edison Company and EDS Nuclear believe the above identified noncompliance to be an isolated occurrence. Therefore, no further action beyond that described in Item 1 above is deemed necessary to prevent recurrence. In addition, the EDS Project Instructions with the old operability criteria are not longer in use. The operability assessments that were performed under the old criteria have all been re-reviewed to the current criteria.

3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The EDS Nuclear implementation of the revised Project Instructions was completed for Commonwealth Edison projects on September 14, 1981.

2580N