



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

December 31, 1981

Mr. James G. Keppler, Regional Administrator  
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  
Response to Inspection Report No.  
50-237/81-31 and 50-249/81-23  
NRC Docket Nos. 50-237/249

Reference (a): C. E. Norelius letter to Cordell Reed  
dated December 4, 1981.

Dear Mr. Keppler:

The following is in response to the inspection conducted by  
Mr. K. A. Connaughton on October 13-14, 16, 19-20, 1981 of  
activities at Dresden Nuclear Power Station Units 2 and 3.  
Reference (a) identified one item of noncompliance. Our response to  
this item is contained in the Attachment to this letter.

Please direct any questions you may have concerning this  
matter to this office.

Very truly yours,

*Thomas J. Rausch*  
Thomas J. Rausch  
Nuclear Licensing Administrator  
Boiling Water Reactor

cc: RIII Inspector - Dresden

SUBSCRIBED and SWORN to  
before me this 31st  
day of December, 1981

*Rosalie A. Penta*  
Notary Public

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Attachment A  
Commonwealth Edison Company  
Response to Notice of Violation

The item of non-compliance identified in Appendix A of the NRC letter, dated December 4, 1981, is responded to in the following paragraphs.

1. 10 CFR 50.55a(g) states that inservice testing of pumps and valves shall be conducted in accordance with the applicable edition and addenda of the ASME Boiler and Pressure Vessel Code, Section XI.

Contrary to the above, the licensee's inservice test program does not include provisions for the analysis of Category A valve leakage-rates in accordance with paragraph IWV-3420(f) ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition and Addenda through Summer of 1975 and implementation of the corrective action requirements of paragraphs IWV-3420(g)(1) and (2) ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition and Addenda through Summer of 1975.

Corrective Actions and Results Achieved

The inservice test program did not include provisions for the analysis of Category A valve leakage rates in accordance with paragraph IWV-3420(f) and paragraph IWV-3420(g)(1) and (2) of the ASME Boiler and Pressure Vessel Code, Section XI, because we inadvertently believed that our request for relief on the test requirements of Category A valves included all sections of paragraph IWV-3420. Personnel involved in implementing the inservice test program are now aware of this non-compliance.

Corrective Actions Taken to Avoid Further Non-Compliance

Station procedures which implement the inservice test program will be revised to include the requirements of paragraphs IWV-3420(f) and IWV-3420(g)(1) and (2). These procedure revisions will be completed in time for the required valve tests during the Unit 3 outage.

Date When Full Compliance will be Achieved

Full compliance will be achieved when the procedure revisions are complete. These procedure revisions will be completed as necessary during the Unit 3 outage to complete the required inservice testing of pumps and valves.