



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

March 15, 1982

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
Revised Response to I.E.
Inspection Report Nos. 50-237/81-31
and 50-249/81-23
NRC Docket Nos. 50-237 and 50-249

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

(b): T. Rausch letter to J. Keppler
dated December 31, 1981.

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection conducted by Mr. K. A. Connaughton on October 13-14, 16, 19, and 20, 1981, of surveillance procedures, surveillance activities, and activities associated with inservice testing of pumps and valves at Dresden Station Units 2 and 3. Appendix A to Reference (a) identified one item of non-compliance with NRC requirements and reference (b) provided our original response to the items of non-compliance.

Subsequent discussions with Messrs. J. Hegner and J. Page of NRR and Mr. K. Connaughton of your staff indicated that the past submittal of our first ten year inservice test program never has received final NRR approval. Presently the second ten year program is being reviewed by NRR. Because of the ambiguous approval status of our first ten year program, it is reasonable that the Technical Specification requirements prevail in this case.

Based upon this information, it is our understanding that both the non-compliance and our Reference (b) response can be withdrawn.

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J. G. Keppler

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Please address 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 Reactors

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cc: Region III Inspector - Dresden

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