



Commonwealth Edison
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April 7, 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 1, 2, & 3
Response to I.E. Inspection
Report Nos. 50-010/81-21,
50-237/81-19 and 50-249/81-31
NRC Docket Nos. 50-010/237/249

Reference (a): R. L. Spessard letter to Cordell
Reed dated March 9, 1982.

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection conducted by Messrs. T. M. Tongue, M. J. Jordan and F. Reimann during the period of December 31, 1981, to January 29, 1982, of activities at Dresden Nuclear Power Station Units 1, 2, and 3. Appendix A to Reference (a) identified one item of non-compliance with NRC requirements. Our response to that item of non-compliance is provided in Attachment A to this letter.

To the best of my knowledge and belief the statements contained in the attachment are true and correct. In some respects these statements are not based on 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.

If you have any questions on this matter, please contact this office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

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cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 2nd day
of April, 1982

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 March 9, 1982, is responded to in the following paragraphs:

1. 10 CFR 50, Appendix B, Criterion II, requires activities affecting quality be accomplished under suitably controlled conditions, including adequate cleanliness. The licensee's Quality Assurance Program, Section 2.2, requires that the licensee adhere to all mandatory requirements of ANSI N18.6. ANSI N18.7-1976, Section 5.2.10, requires quality housekeeping practices encompassing all activities related to control of fire prevention and protection, including disposal of combustible material and debris. In addition, Administrative Procedure DAP 3-11 defines responsibilities for plant cleanliness and items to be examined on plant tours.

Contrary to the above, during routine plant tours on January 26 and 27, 1982, the inspectors identified several safety related equipment areas with significant quantities of combustible materials present. Examples include: (1) the Unit 2 Emergency Diesel Generator room where there were paper wipes, rags, and wood soaked with oil on the floor or on the engine foundation, plus a GI can without a lid containing used oil filters, oily rags, paper, etc.; and (2) the Unit 2/3 Emergency Diesel Generator room, where there were about 12 open oil drums with as much as several gallons of oil remaining in each drum, an open refuse barrel overflowing with oily rags and wipes, etc., plus considerable rags, wipes, and oil on the floor and work bench. In addition, there was evidence of individuals smoking in the Unit 2/3 Diesel Generator room in the form of numerous cigarette butts, burned matches, and an empty match book on the floor.

Corrective Actions and Results Achieved

The combustible materials were immediately removed from the Unit 2 and Unit 2/3 Emergency Diesel Generator rooms. Maintenance foremen and personnel from the operating department were subsequently reminded of the importance of our housekeeping/cleanliness requirements. Also, a "No Smoking" sign has been posted at the entrance to the 2/3 Diesel Generator room as had been done previously for the Unit 2 and Unit 3 Diesel Generator rooms.

Corrective Actions Taken to Avoid Further Non-Compliance

Implementation of the present revision of Procedure DAP 3-11 which defines responsibilities for plant housekeeping practices has been effective in improving plant cleanliness. It is our belief that the non-

compliance described in the I. E. Inspection Report was an isolated case because of the extensive work being done to the diesel generators and the numerous outage activities which were in progress.

Date When Full Compliance Will be Achieved

Since the discussions with the Maintenance and Operating personnel and the posting of a "No Smoking" sign has been accomplished, we believe full compliance has been achieved.