



**Commonwealth Edison**  
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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

July 26, 1985

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3  
Response to Inspection Report  
Nos. 50-237/85-21 and 50-249/85-17  
NRC Docket Nos. 50-237 and 50-249

Reference (a): C. J. Paperiello letter to Cordell Reed  
dated June 17, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. S. Rozak and R. B. Holtzman on May 21-23, 1985, of activities at Dresden Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

*Greg Alexander*  
for D. L. Farrar  
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Dresden

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ATTACHMENT A

RESPONSE TO NOTICE OF NONCOMPLIANCE

Code of Federal Regulations Title 10 Part 21.311(b) states, in part...The total quantity of the radionuclides H-3, C-14, Tc-99 and I-129 must be shown...

Contrary to the above, the quantities of Tc-99 and I-129 were not shown on manifests of shipments to a land disposal facility dated June 6 and 8, 1984. On numerous occasions during the first and second quarters of 1985, the quantities of H-3, C-14, Tc-99 and I-129 were not shown on manifests to land disposal facilities.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. Appropriate station personnel involved with shipping packaged radioactive waste were informed of the necessity of listing H-3, C-14, Tc-99, and I-129 on the Radioactive Shipping Manifest (RSM) on May 23, 1985.
2. Corporate guidelines for posting radionuclides on the RSM were revised by a letter dated May 28, 1985. The letter recommends that H-3, C-14, Tc-99 and I-129 be listed on the RSM regardless of the quantity. It also recommends that if one of these four radionuclides are reported by the commercial laboratory as less than a minimum detectable amount (MDA), the radionuclide should be posted on the summary sheet as being less than MDA with the MDA value noted in parenthesis but the radionuclide need not be posted on the continuation sheets.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Before an RSM is generated for a Commonwealth Edison Company radioactive waste shipment, it will be verified that it lists the quantities of H-3, C-14, Tc-99, and I-129 as required by the Code of Federal Regulations Title 10 Part 21.311(b).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.