



Commonwealth Edison

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June 20, 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. 50-237/85-08 and 50-249/85-07
NRC Docket Nos. 50-237 and 50-249

Reference (a): R. L. Spessard letter to Cordell Reed
dated May 8, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. M. M. Moser of activities at Dresden Station Units 2 and 3. 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,

B. K. Farrar
D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Dresden

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ATTACHMENT

COMMONWEALTH EDISON COMPANY
RESPONSE TO NOTICE OF VIOLATION

As a result of an inspection conducted during March and April 1985, the following violation was identified:

Criterion V of Appendix B to 10 CFR 50, as implemented by Commonwealth Edison Company Corporate Quality Assurance Manual, Chapter 5, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, approximately 25% of work request packages reviewed were not completed in accordance with approved procedures.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

A review of the areas of concern in the above non-compliance has indicated that almost all work groups are involved in some lack of attention to detail. This appears to be the common thread in findings a, b and c contained in the inspection report that are used as the basis for the noncompliance.

Finding d addressed the apparent failure to perform all requirements of a Quality Control (QC) hold point required by DAP 15-1. It is acknowledged that the QC inspector indicated that he was unable to perform the portion of the hold point inspection that addressed verification of cleanliness and exclusion of foreign material during the reactor head installation.

A review of this event indicates that the safety consequences of this failure to inspect was minimal in that cleanliness and exclusion of foreign material had been verified by Fuel Handling personnel. Therefore, it is the station's belief that the deficiency that occurred was the incorrect waiver of this requirement.

CORRECTIONS ACTIONS TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The need for attention to detail proper documentation was addressed at the quarterly meeting with operating management personnel. These same issues will be addressed at the next maintenance management monthly meeting.

All Quality Control (QC) personnel will be reinstructed to specifically look for problems as noted by items a, b and c of the inspection finding. Also, the proper method of insuring performance of hold points or gaining proper waiver of hold points will be discussed with all QC personnel to prevent reoccurrence of item d in the inspection finding.

Tailgate material will be prepared for use during the June 24, 1985 all station tailgate sessions.

Finally, we will review subsequent work request packages for a period of time sufficient to ensure the corrective actions have been properly implemented.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The meeting with maintenance and operating management, QC personnel instruction and Station tailgate sessions are required for full compliance to be achieved and will be implemented by July 15, 1985.