



Commonwealth Edison
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October 17, 1986

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 IE Inspection Reports
Nos. 50-010/86005; 50-237/86008;
50-249/86010; 50-237/86016; and
50-249/86019
NRC Docket Nos. 50-237 and 50-249

Reference (a): Letter from J. G. Keppler to J. J. O'Connor
dated September 17, 1986.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by your staff during the period April 24 through May 9, 1986, and June 30 through July 10, 1986, of certain activities at Dresden Station. The referenced letter indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company's response to the Notice of Violation is provided in Attachment A.

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

Very truly yours,

M. S. Turbak
Operating Plant Licensing Director

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Attachment

cc: NRC Resident Inspector - Dresden

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

NOTICE OF VIOLATION

A a result of the inspection conducted during the periods April 24 through May 9, 1986 and June 30 through July 10, 1986, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the following violation was identified:

10 CFR 71.5 prohibits transport of any licensed material outside the confines of a plant or other place of use, or delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation (DOT) in 49 CFR Parts 170-189.

49 CFR 173.441(a) limits the radiation level on the external surface of any package to 200 mR/h.

Contrary to the above, on April 30, 1986, the radiation levels on the external surface of a wooden box containing contaminated equipment shipped by the license exceeded the 200 mR/h limit.

DISCUSSION

On April 29, 1986, Dresden shipped underwater cutting equipment to Carolina Power and Light Company's Brunswick Station. Dresden was notified by Brunswick the following day that the shipment was received and three locations on the box had surface dose rate readings exceeding 200 mR/h. The increased radiation levels were attributed to two factors. First, there was a load shift in the box during transport resulting in the appearance of the three localized hot spots when the survey was performed at Brunswick. Second, instruments with different centers of ionization were used to perform the release and receipt surveys.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Upon notification of this event, Dresden prohibited radioactive material shipments by Waste Chem from Dresden until the root causes of the event could be determined and corrective actions taken. Until a procedure defining responsibilities for packaging items was drafted, a Health Physicist personally reviewed each radioactive material shipment to verify proper packaging.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATIONS

On August 11, 1986, Dresden implemented a procedure addressing individual responsibilities for packing, blocking and bracing of radioactive material for shipment. The procedure also requires a Station Health Physicist's review of the surveys of the contents of the package. Additional requirements for packaging and surveying the shipment to address point source considerations are assessed based on this review.

The Corporate Health Physics group is developing guidelines for packaging and surveying radioactive material shipments to ascertain the presence of point sources. Recommendations on types of survey instruments to be used are included. These guidelines will be distributed to the operating nuclear stations by October 25, 1986.

The Corporate Quality Assurance procedure defining the requirements for packaging and shipping radioactive materials is also being revised to incorporate the new guidelines. The procedure will be implemented by December 31, 1986.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved immediately after notification of the incident by requiring Station Health Physics involvement in the packaging of shipments. This was accomplished on April 30, 1986.