



Commonwealth Edison
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DCS

May 22, 1987

Mr. James Lieberman, Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Reply to Notice of Violation
NRC Docket Nos. 50-237 and 50-249

- References (a): Letter from A.B. Davis to J.J. O'Connor dated April 23, 1987.
- (b): Letter from D.L. Farrar to J.G. Keppler dated May 23, 1986.
- (c): Letter from L.O. DelGeorge to J.M. Taylor dated August 8, 1986.
- (d): Letter from M.S. Turbak to J.G. Keppler dated September 3, 1986.

Dear Mr. Lieberman:

This is Commonwealth Edison Company's ("Edison") response to the Nuclear Regulatory Commission's ("NRC") Notice of Violation and Proposed Imposition of Civil Penalty for the findings identified in Reference (a). For the most part, the individual findings of deficiencies in Edison's modification procedures were of minimal safety significance. However, the NRC determined that, taken collectively, these deficiencies constituted a significant weakness in Edison's modification program. Thus, the NRC assigned a Severity Level III noncompliance to the deficiencies taken as a whole, but mitigated the base penalty by 50% in recognition of Edison's unusually prompt and comprehensive corrective actions to upgrade its modification process and management controls.

Edison has reviewed the violations and generally agrees with the description of the items of non-compliance. Initially, short-term program improvements were implemented pending the completion of a comprehensive review and evaluation of the modification program. These short-term actions were described at the Region III Offices on May 21, 1986. Subsequently, on July 2, 1986, Edison reported to Region III on the status of preliminary recommendations by the Modification Task Force and on corrective actions already implemented. The status of program modifications was updated on February 20, 1987, when Edison presented to Region III the proposed new modification process and its implementation schedule. That new modification process was formally adopted at Dresden on May 4, 1987.

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Edison believes that its adoption of an improved modification process clearly demonstrated Edison's understanding of the significance of the issues identified in the Notice of Violation. Edison further believes that these extensive corrective actions and the inclusion of increased management involvement as an inherent feature of the improved modification process should preclude the recurrence of these or similar events. In addition, to further assure the adherence to regulatory requirements, program implementation will be audited periodically.

Consistent with this comprehensive response, Edison does not intend to contest any items of non-compliance identified in Reference (a). Due to the large number of items involved, Edison needs until June 23, 1987 to provide detailed responses to the NRC report on the Safety System Outage Modification Inspection. Detailed response to other, related inspection reports have already been provided in References (b), (c) and (d). Finally, a check for \$25,000 is enclosed.

Very truly yours,



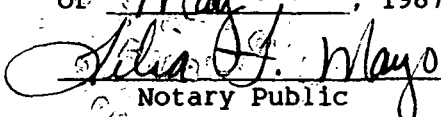
D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: Regional Administrator - RIII
Resident Inspector - Dresden

SUBSCRIBED AND SWORN to
before me this 22nd day
of May, 1987


Notary Public